

## **Environmental Findings**

### **Attachment H-1**

# **CEQA Findings Regarding Significant Effects for the County of San Diego General Plan Update**

**CEQA FINDINGS REGARDING SIGNIFICANT EFFECTS FOR THE  
COUNTY OF SAN DIEGO GENERAL PLAN UPDATE  
SCH # 2002111067**

The following Findings are made for the County of San Diego General Plan Update, and more specifically, for the Recommended Project, which is the alternative recommended for approval by staff based on consideration of the alternatives, project objectives, project benefits, environmental impacts, stakeholder input, Planning Commission hearings, Board of Supervisor hearings, and numerous other factors. The environmental effects of the General Plan Update (hereinafter referred to as the "Recommended Project") are addressed in a Program Environmental Impact Report dated August of 2011, which is incorporated by reference herein.

The Final Environmental Impact Report (FEIR) prepared for the General Plan Update consists of four volumes:

- Volume 1: Program EIR evaluating the Proposed Project and a reasonable range of alternatives
- Volume 2: Technical Appendices to the EIR
- Volume 3: Summary of Changes to the Draft EIR, Comment Letters and Responses to Comments on the Draft EIR
- Volume 4: Amendment to the EIR, Description and Analysis of the Recommended Project

The FEIR evaluated potentially significant effects for the following environmental areas of potential concern: 1) Aesthetics; 2) Agricultural Resources; 3) Air Quality; 4) Biological Resources; 5) Cultural And Paleontological Resources; 6) Geology And Soils; 7) Hazards and Hazardous Materials; 8) Hydrology and Water Quality; 9) Land Use and Planning; 10) Mineral Resources; 11) Noise; 12) Population and Housing; 13) Public Services; 14) Recreation; 15) Transportation and Traffic; 16) Utilities and Service Systems, and 17) Climate Change.

Of these seventeen environmental subject areas, the County Board of Supervisors concurs with the conclusions in the FEIR that only Geology/Soils and Population/Housing will not involve potentially significant impacts. Moreover, the remaining environmental issues evaluated will include impacts that are significant and unavoidable with the exception of the following four subject areas in which all impacts will be mitigated below a level of significance: Cultural and Paleontological Resources, Land Use and Planning, Recreation, and Climate Change. For those areas in which environmental impacts will remain significant and unavoidable, even with the implementation of mitigation measures, overriding considerations exist which make the impacts acceptable.

The California Environmental Quality Act (CEQA) (California Public Resources Code §21000 *et. seq.* and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 *et. seq.*) require that no public agency shall approve or carry out a project which identifies one or more significant environmental effects of a project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

- (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effects on the environment;
- (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been or can or should be adopted by that other agency; or
- (3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR (CEQA, §21081(a); Guidelines, §15091(a)).

For each significant effect identified for the General Plan Update, one of the above three findings applies. Therefore, the discussion of significant impacts, and mitigation measures where possible, are organized below by finding rather than by environmental subject area.

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## Section A – Finding (1)

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Pursuant to Section 15091(a)(1) of the State CEQA Guidelines, the County of San Diego Board of Supervisors finds that, for each of the following significant effects as identified in the FEIR, changes or alterations (Mitigation Measures) have been required in, or incorporated into, the project which avoid or substantially lessen each of the significant environmental effects as identified in the FEIR. The significant effects (Impacts) and Mitigation Measures are stated fully in the FEIR. The following section identifies all issue areas in the EIR for which changes or alternations (Mitigation Measures) have been required in, or incorporated into, the project which avoid or substantially lessen each of the significant environmental effects as identified in the FEIR. The rationale for this finding for each Impact is as follows:

### ***AESTHETICS***

**A-1 Significant Effect – Scenic Vistas:** The FEIR identifies significant impacts associated with the potential obstruction, interruption, or detracting of a scenic vista as a result of future development activity.

**Mitigation Measures:** Aes-1.1 through Aes-1.11.

**Facts in Support of Finding:** The County contains visual resources affording opportunities for scenic vistas in every community. Although there are no formally designated scenic vistas, various communities have identified Resource Conservation Areas that have aesthetic value. These are described in detail in section 2.1.1.2 of the FEIR. Visual access to these resources is available via public roads, parks, and trails. If future development or infrastructure is developed that is inconsistent with these vistas, it could detract from the scenic value and would cause a significant impact.

The project contains goals and policies in the Land Use, Mobility, and Conservation and Open Space Elements to protect scenic vistas by requiring development to preserve or conserve scenic features of the County. The relevant policies are: LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, LU-6.9, LU-10.1, LU-10.2, M-2.3, COS-11.1, COS-11.2, COS-11.3, COS-11.4, COS-11.5, COS-11.6, COS-11.7; COS-12.1; COS-12.2. These policies direct development away from undeveloped areas with intact sensitive natural resources by designating these areas for very low-density or intensity land uses, support conservation-oriented project design when consistent the applicable community plan, require certain residential subdivisions to conserve open space and natural resources, require incorporation of natural features into proposed development, require contiguous open space areas, require new development to conform to the natural topography to limit grading and not significantly alter the dominant physical characteristics of a site, require new residential development to be integrated with existing neighborhoods, require the location and development of private roads to minimize visual impacts, and protect scenic highways. Adherence to these policies will reduce potential obstruction, interruption, or detracting of scenic vistas.

The land use maps have been developed to locate land uses of less density or intensity on those lands that contribute to scenic vistas. In addition, the project includes further mitigation measures for potentially significant impacts as follows:

- Aes-1.1 will ensure that lands contributing to scenic vistas will not be developed with high density or high intensity uses. Therefore, visual impacts will be avoided or lessened. Visual resources will not be significantly affected by build-out of the project.
- Aes-1.2 requires protections of sensitive biological habitats and species through the Biological Mitigation Ordinance, the Resource Protection Ordinance, Habitat Loss Permit Ordinance and the Multiple Species Conservation Program. By conserving natural resources, these regulations also preserve natural open space that contribute to the quality of many of the County's scenic vistas.
- Aes-1.3 will result in updates to Community Plans, which will further ensure that future development reflects the character and vision of each unincorporated community. Where scenic resources are a characteristic part of such communities, development proposals will need to avoid or minimize potential visual impacts.
- Aes-1.4 will result in an improved Design Review process for future development. This will allow a more current and consistent approach to a subjective issue, thereby ensuring that surrounding scenic resources are considered during the site design process to minimize potential impacts.
- Aes-1.5 is the preparation and implementation of a Conservation Subdivision Program, under which future subdivisions will be encouraged to use preserve design

standards to conserve resources on site including visual scenic vistas and minimize impacts to natural resources. Such a program would guide preservation adjacent to other open space areas, avoiding impacts to sensitive areas, including scenic vistas. Thus, new development pursuant to the plan will be less likely to detract value from scenic resources, minimizing impacts to these resources.

- Aes-1.6 will require community review and specific compatibility findings for development projects that may have significant adverse effects on scenic resources. These measures will help ensure that project designs are compatible with the surrounding context, especially where scenic resources are in close proximity.
- Aes-1.7 will result in programs and regulations that preserve agricultural lands. Agricultural lands are often key components of scenic vistas and an integral part of community character. Therefore, preservation of these lands will help to minimize potential impacts to scenic resources.
- Aes-1.8 is direction to develop and improve regulations that protect the County's unique topography. This measure will minimize potential impacts to steep slopes and ridgelines that contribute to scenic landscapes in the unincorporated County because these regulations prohibit the disturbance of these resources.
- Aes-1.9 is the identification of scenic resources in the County through a cooperative effort among stakeholders. The data collected can then be used to evaluate future development projects within proximity to areas of specific scenic value and minimize or mitigate potential impacts.
- Aes-1.10 requires the County to participate in local and regional planning efforts with other agencies/entities. In so doing, the County will be able to better identify scenic resources within or near its land use jurisdiction. This effort will facilitate the protection of such resources because they will be identified and impacts to them can be avoided when processing development projects.
- Aes-1.11 will continue the on-going efforts to require undergrounding of utilities for projects and to convert existing overhead utilities. This measure will reduce potential impacts to scenic vistas from overhead utility facilities throughout the County unincorporated area.

**Cumulative Impact – Scenic Vistas:** Cumulatively, projects located in the San Diego region would have the potential to result in a cumulative impact due to obstruction, interruption, or detract from scenic vistas. In combination with other ongoing projects, the General Plan Update would have the potential to result in impacts that are cumulatively considerable. However, the General Plan Update policies and mitigation measures described above, in combination with the Resource Protection Ordinance and

County Zoning Ordinance, would mitigate cumulative impacts to scenic vistas to below a significant level.

- A-2 Significant Effect – Scenic Resources:** The FEIR identifies a significant impact to scenic resources associated with the potential removal or substantial adverse change of features that contribute to the valued visual character or image of a neighborhood, community, State Scenic Highway, or localized area.

**Mitigation Measures:** Aes-1.1 through Aes-1.11

**Facts in Support of Finding:** The unincorporated County contains many scenic resources including mountains, watersheds, scenic geologic features, and Resource Conservation Areas that have been identified for protection because of their scenic value. Scenic resources are often found in parks, habitat preserves, reservoirs, and other undeveloped lands throughout the County, but can also be found in urbanized areas. Future residential, commercial or infrastructure development would have the potential to result in the removal or alteration of scenic neighborhood or community resources. In addition, development along the two designated state scenic highways located in the County would have the potential to detract from the visual quality of the scenic highway.

The project contains goals and policies in the Land Use, Mobility, and Conservation and Open Space Elements to protect scenic resources. The relevant policies are: LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, LU-6.9, LU-10.1, LU-10.2, M-2.3, COS-11.1, COS-11.2, COS-11.3, COS-11.4, COS-11.5, COS-11.6, COS-11.7; COS-12.1; COS-12.2. These policies direct development away from undeveloped areas with intact sensitive natural resources by designating these areas for very low-density or intensity land uses, support conservation-oriented project design when consistent the applicable community plan, require certain residential subdivisions to conserve open space and natural resources, require incorporation of natural features into proposed development, require contiguous open space areas, require new development to conform to the natural topography to limit grading and not significantly alter the dominant physical characteristics of a site, require new residential development to be integrated with existing neighborhoods, require the location and development of private roads to minimize visual impacts, and protect scenic highways. Adherence to these policies will minimize potential removal or alteration of scenic resources.

The land use maps have been developed to locate land uses of less density or intensity on those lands that contribute to scenic resources. In addition, the project includes further mitigation measures for potentially significant impacts as follows:

- Aes-1.1 will ensure that lands contributing to scenic vistas will not be developed with high density or high intensity uses. Therefore, visual impacts will be avoided or

lessened. Visual resources will not be significantly affected by build-out of the project.

- Aes-1.2 requires protections of sensitive biological habitats and through the Biological Mitigation Ordinance, the Resource Protection Ordinance, Habitat Loss Permit Ordinance, and the Multiple Species Conservation Program. By conserving natural resources, these regulations also preserve scenic resources.
- Aes-1.3 will result in updates to Community Plans, which will further ensure that future development reflects the character and vision of each unincorporated community. The updates will identify locations of scenic resources, and where scenic resources are a characteristic part of such communities, development proposals can be required to avoid or minimize potential visual impacts.
- Aes-1.4 will result in an improved Design Review process for future development. This will allow a more current and consistent approach to a subjective issue, thereby ensuring that surrounding scenic resources are considered during the site design process to minimize potential impacts.
- Aes-1.5 is the preparation and implementation of a Conservation Subdivision Program, under which future subdivisions will be encouraged to use preserve design standards to conserve resources on site including visual scenic vistas and minimize impacts to natural resources. Such a program would guide preservation adjacent to other open space areas, avoiding impacts to sensitive areas, including scenic vistas. Thus, new development pursuant to the plan will be less likely to detract value from scenic resources, minimizing impacts to these resources.
- Aes-1.6 will require community review and specific compatibility findings for development projects that may have significant adverse effects on scenic resources. These measures will help ensure that project designs are compatible with the surrounding context, especially where scenic resources are in close proximity.
- Aes-1.7 will result in programs and regulations that preserve agricultural lands. Agricultural lands are often key components of scenic vistas and an integral part of community character. Therefore, preservation of these lands will help to minimize potential impacts to scenic resources.
- Aes-1.8 is direction to develop and improve regulations that protect the County's unique topography. This measure will minimize potential impacts to steep slopes and ridgelines that contribute to scenic landscapes in the unincorporated County because these regulations can prohibit the disturbance of these resources.
- Aes-1.9 is the identification of scenic resources in the County through a cooperative effort among stakeholders. The data collected can then be used to evaluate future

development projects within proximity to areas of specific scenic value and minimize or mitigate potential impacts.

- Aes-1.10 requires the County to participate in local and regional planning efforts with other agencies/entities. In so doing, the County will be able to better identify scenic resources within or near its land use jurisdiction. This effort will facilitate the protection of such resources because local agencies will be able to consider scenic resources adjacent to their jurisdictions when planning development and infrastructure.
- Aes-1.11 will continue the on-going efforts to require undergrounding of utilities for projects and to convert existing overhead utilities. This measure will reduce potential impacts to scenic resources from overhead utility facilities throughout the County unincorporated area.

**Cumulative Impact – Scenic Resources:** Cumulatively, projects located in the San Diego region would have the potential to result in a cumulative impact to scenic resources due to removal or substantial adverse change of one or more features that contribute to the valued visual character or image of a neighborhood, community, State scenic highway, or localized area. In combination with other ongoing projects, the proposed General Plan Update project would have the potential to result in impacts that are cumulatively considerable. However, the proposed General Plan Update policies and mitigation measures described above, in combination with the Resource Protection Ordinance and County Zoning Ordinance, would mitigate cumulative impacts to scenic vistas to below a significant level.

## **AGRICULTURE**

**A-3 Significant Effect – Land Use Conflicts:** The FEIR identifies significant impacts related to land use conflicts with Williamson Act contract lands.

### **Mitigation Measures:** Agr-2.1

**Facts in Support of Finding:** While approximately 402,100 acres of agricultural land are within County adopted Agricultural Preserves; only approximately 80,500 acres of that land is currently under Williamson Act Contract. The project would remove approximately 321,590 acres of land that is not currently under Williamson Act Contracts from adopted Agricultural Preserves. A direct land use conflict would not occur; however, agricultural resources may be impacted through the removal of non-contracted lands from Agricultural Preserves. Where such lands occur at the boundary of a Contract area, new incompatible land uses could be developed adjacent to existing agricultural operations. Incompatible land uses could result in an indirect conversion of agricultural resources. Therefore, a potential land use conflict would occur because agricultural resources under Williamson Act Contract, and in the vicinity of the areas removed from



Agricultural Preserve designation, may no longer be fully protected from surrounding development pressures.

The project contains goals and policies in the Land Use and Conservation and Open Space Elements that would reduce agricultural land use conflicts. The relevant policies are LU-7.1 and COS-6.3. These policies require lower density development designations, and siting of compatible recreational and open space uses in agricultural areas. Adherence to these policies will reduce potential land use conflicts with Williamson Act Contract lands because it will ensure that lands adjacent to Contract lands will either have low intensity development, or open space uses.

In addition, the project includes a mitigation measure which will mitigate potentially significant impacts as follows:

- Agr-2.1 requires that prior to approval of any Zoning Ordinance Amendment an impact analysis be completed for each land area proposed to be removed from Agricultural Preserve. The analysis will determine whether or not the action will have indirect effects on Williamson Act Contract lands and the Agricultural Preserve disestablishment. If potential impacts are identified, then removal of the preserve status (*i.e.*, the Zoning Ordinance Amendment) will not take place. This will ensure that potential land use conflicts with Williamson Act Contract lands are avoided.

**Cumulative Impact – Land Use Conflicts:** Within the San Diego region, cumulative projects would not result in conflicts with existing agricultural zoning or Williamson Act Contracts since regulations are in place to prevent such conflicts. Implementation of the General Plan Update would result in a potentially significant conflict with agricultural zoning or land under Williamson Act Contract. However, a potentially significant cumulative impact would not occur from the combined impacts of other cumulative projects. Therefore, the proposed General Plan Update would not contribute to a potentially significant cumulative impact.

## **BIOLOGICAL RESOURCES**

**A-4 Significant Effect – Federally Protected Wetlands:** The FEIR identifies significant impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act.

**Mitigation Measures:** Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, Bio-2.2, Bio-2.3, and Bio-2.4.

**Facts in Support of Finding:** Impacts to federally protected wetlands would occur if development resulted in removal, filling, hydrological interruption, or other disturbance of wetlands. Based on an estimate in the FEIR, approximately 1,706 acres of federally defined wetlands would have the potential to be impacted by the project.

The project includes policies in the Conservation and Open Space Element which would reduce the potential for adverse impacts to federally protected wetlands. The relevant policies are: COS-3.1 and COS-3.2. Adherence to these policies will reduce direct impacts to federally protected wetlands from future development because they require new development to protect and avoid wetland areas and where impacts do occur they require a no-net loss of wetland habitats.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Bio-1.1 requires the preparation and implementation of a Conservation Subdivision Program, under which future subdivisions will use preserve design standards to conserve sensitive habitat on site and minimize impacts to natural resources. This program will prevent direct impacts to federally protected wetlands located on subdivision sites.
- Bio-1.5 requires the use of GIS and other tools to identify sensitive resources, such as wetlands, on project sites at time of project processing. It also requires application of the County Guidelines for Determining Significance for Biological Resources during project review to avoid or mitigate potential impacts to sensitive biological resources, including federally protected wetlands.
- Bio-1.6 requires application of County ordinances to projects for the purpose of protecting important biological resources. This includes the Resource Protection Ordinance, the Biological Mitigation Ordinance, and the Habitat Loss Permit Ordinance. Sensitive resources protected under these regulations include wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. Under these regulations, impacts to federally protected wetlands are either avoided or mitigated to the standard of no-net-loss to wetlands.
- Bio-1.7 requires application of other County ordinances that minimize indirect effects to biological resources. Such regulations include the Noise Ordinance, the Groundwater Ordinance, Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. As these regulations are applied to projects, potential impacts to federally protected wetlands are further minimized or avoided.
- Bio-2.2 requires that development projects obtain CWA Section 401/404 permits issued by the California Regional Water Quality Control Board and U.S. Army Corps of Engineers for all project-related disturbances of waters of the U.S. and/or associated wetlands. It further requires that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of

Fish and Game for all project-related disturbances of streambeds. These permitting processes require that impacts are avoided or mitigated to the satisfaction of the state and federal agencies.

- Bio-2.3 requires that wetlands and wetland buffer areas be adequately preserved whenever feasible to maintain biological functions and values. This standard shall be applied to private and public projects and to minimize potential impacts to federally protected wetlands.
- Bio-2.4 requires implementation of the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands. By reducing polluted runoff and improving the water quality of receiving waters, this ordinance shall further minimize potential impacts to federally protected wetlands.

**Cumulative Impact – Federally Protected Wetlands:** Cumulatively, projects located in the San Diego region would have the potential to result in a cumulative impact to federally protected wetlands. However, individual projects will be required to mitigate their impacts to the extent feasible to meet the no-net-loss standard. Existing regulations and policies noted above would ensure that a significant cumulative impact associated with federally protected wetlands would not occur. Therefore, the project would not contribute to a significant cumulative impact.

## ***CULTURAL RESOURCES***

**A-5 Significant Effect – Historical Resources:** The FEIR identifies significant impacts to historical resources as defined in Section 15064.5 of the state CEQA Guidelines or the County's Resource Protection Ordinance.

**Mitigation Measures:** Cul-1.1 through Cul-1.8

**Facts in Support of Finding:** Impacts to historical resources would occur if development resulted in physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. Both direct and indirect impacts to historical resources may result from development under the project.

The project includes a policy in the Conservation and Open Space Element which would reduce the potential for adverse impacts to historical resources. The relevant policy is COS-8.1. This policy encourages the preservation and/or appropriate adaptive re-use of historic structures and the preservation of historical landscaping as a means of protecting important historical resources while respecting the heritage, context, design, and scale of older structures and neighborhoods. Adherence to these policies will reduce direct impacts to historical resources from future development because the

preservation or adaptive reuse of historic sites, structures, and landscapes will be encouraged.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Cul-1.1 is the utilization of regulations such as the Resource Protection Ordinance, CEQA Guidelines, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources. This will be accomplished by requiring appropriate reviews to identify historic resources and requiring avoidance or mitigation to when impacts are significant.
- Cul-1.2 requires the County to provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources. This will minimize potential direct and indirect impacts to historical resources since property owners will be encouraged to maintain those resources, and will obtain tax benefits from doing so.
- Cul-1.3 will result in a new effort to identify and catalog historic and potentially historic resources within unincorporated San Diego County. This will ensure that landowners are better informed of potential resources on their properties as well as the options available to them under the State/National Register or the Mills Act. In some cases, properties may be zoned with a special area designator for historic resources, thereby restricting demolition/removal and requiring a Site Plan permit for proposed construction which will be reviewed by the Historic Site Board. This measure will ameliorate on-going impacts as well as potential impacts that may result from development under the project.
- Cul-1.4 requires the County to support the Historic Site Board in their efforts to provide oversight for historic resources. This Board is an advisory body that provides recommendations to decision makers regarding archaeological and historic cultural resources. The Historic Site Board is responsible for reviewing resources seeking historic designation and participation in the Mills Act as well as discretionary projects with significant cultural resources. This coordination will increase awareness of existing resources and minimize potential direct or indirect effects from development or environmental changes.
- Cul-1.5 requires landmarking and historical listing of County owned historic sites. In so doing, the County can increase public awareness and prevent potential impacts that would otherwise result from development permits.
- Cul-1.6 is the implementation, and update as necessary, of the County's Guidelines for Determining Significance for Cultural Resources. These guidelines apply to all

discretionary actions and require identification and minimization of adverse impacts to historic and archaeological resources.

- Cul-1.7 requires the County to identify potentially historic structures within the County through the use of surveys, input from the Historic Site Board, information from the Save Our Heritage Organization as well as from planning groups and other jurisdictions. Once identified, the County will keep these records in the property database and monitor their status with updates every five years. This information will be used to help avoid potential impacts as described in Cul-1.6 above.
- Cul-1.8 is the revision of the Resource Protection Ordinance to apply to the demolition or alteration of identified significant historic structures.

**Cumulative Impact – Historical Resources:** Cumulatively, projects located in the southern California region would have the potential to result in a cumulative impact associated with the loss of historical resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. Past projects involving development and construction have already impacted historical resources within the region. Additionally, the project would result in a potentially significant cumulative impact prior to mitigation. However, the proposed General Plan Update policies and mitigation measures identified above would mitigate potentially significant cumulative impacts identified for the project to a less than significant level.

**A-6 Significant Effect – Archaeological Resources:** The FEIR identifies significant impacts to archaeological resources from potential ground-disturbing activities associated with future development.

**Mitigation Measures:** Cul-1.1, Cul-1.6, and Cul-2.1 through 2.6

**Facts in Support of Finding:** Impacts to archaeological resources would occur if development resulted in a substantial adverse change in the significance of an archaeological resource as defined by Public Resources Code Section 21083.2 and State CEQA Guidelines Section 15064.5(a). Indirect impacts may also occur from land use development activities that increase erosion, fugitive dust, or the accessibility of a surface or subsurface resource.

The project includes policies in the Conservation and Open Space Element which would reduce the potential for adverse impacts to archaeological resources. The relevant policies are: COS-7.1, COS-7.2, COS-7.3, and COS-7.4. These policies describe how archaeological resources should be protected, require new development to include appropriate mitigation to protect the quality and integrity of important archaeological resources, promote avoidance of archaeological resources and protection of them in open space easements whenever possible, require appropriate treatment and

preservation of collected archaeological resources, and require consultation with local Native American tribes concerning the preservation and treatment of tribal archaeological resources and support of appropriate signage. Adherence to these policies will reduce direct impacts to archaeological resources from future development.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Cul-1.1 is the utilization of regulations such as the Resource Protection Ordinance, CEQA Guidelines, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources. This will be accomplished by requiring appropriate reviews to identify historic resources and requiring avoidance or mitigation to resources when impacts are significant.
- Cul-1.6 is the implementation, and update as necessary, of the County's Guidelines for Determining Significance for Cultural Resources. These guidelines apply to all discretionary actions and require identification and minimization of adverse impacts to historic and archaeological resources.
- Cul-2.1 requires that the County develop management and restoration plans for identified and acquired properties with archaeological resources. Such plans will prevent or ameliorate adverse changes in the significance of known archaeological resources.
- Cul-2.2 is the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information. Such acquisitions would preserve resources in their existing sites while preventing disclosure of the locations to the general public.
- Cul-2.3 requires County support of dedication of easements that protect important cultural resources through a variety of funding methods, such as grants or matching funds, or funds from private organizations. Such easements preserve cultural resources in their existing site locations and thus, help to minimize potential direct or indirect impacts.
- Cul-2.4 is the on-going regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review. These cooperative efforts ensure that significant sites are identified and preserved to the satisfaction of all parties.
- Cul-2.5 requires grading monitoring by a qualified archaeologist and a Native American monitor during ground disturbing activities in the vicinity of known archaeological resources and during initial surveys. The use of monitors prevents direct impacts to archaeological resources.

- Cul-2.6 requires identification and acquisition of important resources through regional coordination with agencies and institutions such as the South Coast Information Center (SCIC). It further requires consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review. These steps would ensure that identified archaeological resources are protected in place.

**Cumulative Impact – Archaeological Resources:** Cumulatively, projects located in the southern California region would have the potential to result in a cumulative impact associated with the loss of archaeological resources through development activities that could cause a substantial adverse change in the significance of an archaeological resource. Past projects involving development and construction have already impacted archaeological resources within the region. Additionally, the project would result in a potentially significant cumulative impact prior to mitigation. However, the proposed General Plan Update policies and mitigation measures identified above would mitigate the project's potentially significant direct and cumulative impacts related to archaeological resources to a less than significant level.

**A-7 Significant Effect – Paleontological Resources:** The FEIR identifies significant impacts to paleontological resources from future development activities.

**Mitigation Measures:** Cul-3.1 and Cul-3.2

**Facts in Support of Finding:** Paleontological resources are found in sedimentary strata of the County, which primarily underlies the coastal plain, the desert and some mountain valleys. Impacts to paleontological resources would occur if development activities directly or indirectly destroy a unique paleontological resource or site. Such impacts usually result from the physical destruction of fossil remains by excavation operations that cut into geologic formations.

The project includes one goal and policy in the Conservation and Open Space Element that would protect paleontological resources. The relevant goal is COS-9 and the relevant policy is COS-9.1, which requires the salvage and preservation of unique paleontological resources when exposed to the elements during excavation, grading activities, or other development practices. Adherence to this policy will reduce direct impacts to paleontological resources from future development.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Cul-3.1 implements the County Grading Ordinance and CEQA guidelines which require a paleontological resources monitor during grading when appropriate, to avoid or minimize impacts to resources, and to apply appropriate mitigation when impacts are significant (e.g., salvage, curation, data collection, etc.). These measures would prevent significant losses of unique paleontological resources.

- Cul-3.2 requires the County to implement, and update as necessary, the County's Guidelines for Determining Significance for Paleontological Resources to identify and minimize adverse impacts to paleontological resources. These guidelines apply to discretionary actions and development projects under the project and result in identification of resources and avoid or mitigate significant impacts.

**Cumulative Impact – Paleontological Resources:** Cumulatively, projects located in the southern California region would have the potential to result in a cumulative impact associated with paleontological resources from extensive grading, excavation or other ground-disturbing activities. Additionally, the project would result in a potentially significant cumulative impact prior to mitigation. However, the proposed General Plan Update policy and mitigation measure identified in Section 2.5.6.3 would mitigate project's potentially significant direct and cumulative impacts related to paleontological resources to a less than significant level.

**A-8 Significant Effect – Human Remains:** The FEIR identifies significant impacts to human remains from future development activities.

**Mitigation Measures:** Cul-1.1, Cul-1.6, and Cul-4.1

**Facts in Support of Finding:** Archaeological investigations within the unincorporated County have identified human remains from prior human occupations, which are important cultural resources. The disturbance of human remains, Native American or otherwise, including those interred outside of formal cemeteries, is considered a significant impact.

The project includes one policy in the Conservation and Open Space Element that addresses human remains. The relevant policy is COS-7.5. Adherence to this policy will reduce direct impacts to human remains from future development because it requires that where human remains are encountered, they be treated in a dignified manner.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Cul-1.1 is the utilization of regulations such as the Resource Protection Ordinance, CEQA Guidelines, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources. This will be accomplished by requiring appropriate reviews to identify historic resources and requiring avoidance or mitigation to when impacts are significant.
- Cul-1.6 is the implementation, and modification as necessary, of the County's Guidelines for Determining Significance for Cultural Resources. These guidelines



are used in conjunction with permitting processes to identify and minimize adverse impacts to historic and archaeological resources, including human remains.

- Cul-4.1 requires that all land disturbance and archaeological-related programs include regulations and procedures that address what to do if human remains are discovered. These procedures will promote preservation and include proper handling and mitigating actions. They will also require coordination with applicable Native American groups.

**Cumulative Impact – Human Remains:** Cumulative projects located in the southern California region would have the potential to result in impacts associated with human remains due to grading, excavation or other ground-disturbing activities. Additionally, the project would result in a potentially significant cumulative impact prior to mitigation. However, the proposed General Plan Update policy and mitigation measure identified above would mitigate potentially significant direct and cumulative impacts related to human remains to a less than significant level.

## ***HAZARDS AND HAZARDOUS MATERIALS***

**A-9 Significant Effect – Public Airports:** The FEIR identifies significant safety hazard impacts associated with development near public airports.

**Mitigation Measures:** Haz-1.1 through Haz-1.5

**Facts in Support of Finding:** Within the unincorporated County of San Diego, there are six public airports, including Fallbrook Community Airport, Borrego Valley Airport, Ocotillo Airport, Ramona Airport, Agua Caliente Airstrip, and Jacumba Airport. The project proposes rural lands, open space, semi-rural lands, and federal or State land designations near public airports. However, some public airports, such as Fallbrook Community Airport, may have village residential uses designated nearby, which would maintain higher density populations. Development would be required to comply with the applicable Airport Land Use Compatibility Plan (ALUCP). But if projects are located within the Airport Influence Area (AIA) of a public airport they could result in airport safety hazards for people living or working in these areas.

The project includes policies in the Safety Element and Mobility Element that would reduce safety hazards associated with public airports. The relevant policies are S-15.1, S-15.2, S-15.3, and M-7.1. These policies require coordination with the Airport Land Use Commission (ALUC) and support review of Airport Land Use Compatibility Plans for development within Airport Influence Areas, require land uses surrounding airports to be compatible with the operation of each airport, require operational plans for new public/private airports and heliports to be compatible with existing and planned land uses that surround the airport facility, restrict potentially hazardous obstructions or other hazards to flight located within airport approach and departure areas, discourage uses

that may impact airport operations or do not meet federal or State aviation standards, and require minimization of impacts to environmental resources and surrounding communities when operating and/or expanding public aviation facilities. Adherence to these policies will reduce safety hazard impacts associated with public airports.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Haz-1.1 requires the County to apply the Guidelines for Determining Significance, Airport Hazards, when reviewing new development projects to ensure compatibility with surrounding airports and land uses. It also requires application of appropriate mitigation, such as design/construction standards and aviation easements, when impacts are significant. This measure will prevent potential safety hazards associated with development located near public airports because specific design standards will be applied to ensure that the new development is compatible with the nearby uses.
- Haz-1.2 is the participation in the development of ALUCPs and future revisions to the ALUCPs to ensure the compatibility of land uses and airport operations. By working closely with the San Diego County Regional Airport Authority (SDCRAA), potential land use conflicts and safety hazards can be prevented.
- Haz-1.3 requires that the Air Installation Compatible Use Zone (AICUZ) Program be considered when reviewing new development within the influence area. Such development projects must be consistent with the land use compatibility and safety policies within the AICUZ in order to minimize potential safety hazards.
- Haz-1.4 entails close coordination between DPW and DPLU staff when planning new airports or operational changes to existing airports when those changes would produce new or modified airport hazard zones. This will help to minimize land use compatibility issues and potential safety hazards.
- Haz-1.5 requires close coordination with the San Diego County Regional Airport Authority (SDCRAA) and County Airports for issues related to airport planning and operations. This will further help to minimize land use compatibility issues and potential safety hazards.

**Cumulative Impact – Public Airports:** Cumulative projects, such as general plans in surrounding jurisdictions or developments on tribal lands or within Mexico, would potentially result in incompatible land uses within the vicinity of a public airport. This could result in a potentially significant safety hazard for people residing or working in these project areas. However, cumulative projects in the County and surrounding jurisdictions would be subject to safety regulations, such as ALUCPs, FAA standards and the State Aeronautics Act, which would reduce the potential for safety hazards to

below a level of significance. Therefore, cumulative projects would not result in a potentially significant cumulative impact. Therefore, the proposed General Plan Update would not contribute to a potentially significant cumulative impact.

**A-10 Significant Effect – Private Airports:** The FEIR identifies significant safety hazard impacts associated with development near private airports.

**Mitigation Measures:** Haz-1.1 through Haz-1.5

**Facts in Support of Finding:** Within the unincorporated County, private airports are located in the communities of Alpine, Bonsall, Central Mountain, Desert, Jamul/Dulzura, Julian, Mountain Empire, North County Metro, North Mountain, Otay, Pala/Pauma, Pendleton/De Luz, Ramona, and Valley Center. Caltrans' Division of Aeronautics controls private and special-use airports through a permitting process, and is also responsible for regulating operational activities at these airports. The project generally includes rural and semi-rural designations near private airports. However, a few private airports, such as Blackington Airpark in Valley Center, would have higher density designations adjacent to them.

The project includes policies in the Safety Element and Mobility Element that would reduce safety hazards associated with private airports. The relevant policies are S-15.1, S-15.2, S-15.3, and S-15.4. These policies require coordination with the Airport Land Use Commission (ALUC) and support review of Airport Land Use Compatibility Plans for development within Airport Influence Areas, require land uses surrounding airports to be compatible with the operation of each airport, require operational plans for new public/private airports and heliports to be compatible with existing and planned land uses that surround the airport facility, restrict potentially hazardous obstructions or other hazards to flight located within airport approach and departure areas, and discourage uses that may impact airport operations or do not meet federal or State aviation standards. In addition, Policy S-15.4 would locate private airstrips and heliports outside of safety zones and flight paths for existing airports and in a manner to avoid impacting public roadways and facilities compatible with surrounding established and planned land uses. Adherence to these policies will reduce safety hazard impacts associated with private airports.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Haz-1.1 requires the County to apply the Guidelines for Determining Significance, Airport Hazards, when reviewing new development projects to ensure compatibility with surrounding airports and land uses. It also requires application of appropriate mitigation, such as design/construction standards and aviation easements, when impacts are significant. Potential safety hazards associated with development near

private airports can be avoided by following these guidelines because it will ensure that development projects are compatible with surrounding private airports.

- Haz-1.2 is the participation in the development of ALUCPs and future revisions to the ALUCPs to ensure the compatibility of land uses and airport operations. By working closely with the San Diego County Regional Airport Authority (SDCRAA), potential land use conflicts and safety hazards can be prevented by locating new airport facilities in areas that avoid conflicts with development. .
- Haz-1.3 requires that the Air Installation Compatible Use Zone (AICUZ) Program be considered when reviewing new development within the influence area. Such development projects must be consistent with the land use compatibility and safety policies within the AICUZ in order to minimize potential safety hazards.
- Haz-1.4 entails close coordination between DPW and DPLU staff when planning new airports or operational changes to existing airports when those changes would produce new or modified airport hazard zones. This will help to minimize land use compatibility issues, and thereby identify and prevent potential safety hazards.
- Haz-1.5 requires close coordination with the SDCRAA and County Airports for issues related to airport planning and operations. This will further help to minimize land use compatibility issues, and will ensure that the County identifies and avoids potential safety hazards.
- Haz-2.1 is the implementation of the Zoning Ordinance, which requires Major Use Permits for private airports and heliports. The Major Use Permit findings and requirements will help to minimize potential land use compatibility conflicts and safety hazard issues for development near private airports. Projects that cannot be found to be compatible would be denied.

**Cumulative Impact – Private Airports:** Cumulative projects, such as general plans in surrounding jurisdictions or developments on tribal lands or within Mexico, would potentially result in incompatible land uses within the vicinity of a private airport. This could potentially result in a significant safety hazard for people residing or working in these project areas. However, cumulative private airport projects would each be subject to safety regulations, such as FAA standards, DOD standards and the State Aeronautics Act, which would reduce the potential for safety hazards to below a level of significance. As such, these projects would not result in a potentially significant cumulative impact. Therefore, the proposed General Plan Update would not contribute to a potentially significant cumulative impact.

**A-11 Significant Effect – Emergency Response and Evacuation Plans:** The FEIR identifies potential significant impacts from future development associated with adopted emergency response plans or emergency evacuation plans.

**Mitigation Measures:** Haz-3.1 through Haz-3.3

**Facts in Support of Finding:** San Diego County has a comprehensive emergency plan called the Operational Area Emergency Plan (OAEP). While the project would not conflict with this plan, increased land uses and development may result in areas that have not accounted for additional growth in their existing emergency response and evacuation plans. Therefore, the project would have the potential to impair those emergency response and evacuation plans.

The project includes policies in the Safety Element and Mobility Element that address potential interference with adopted emergency response and evacuation plans. The relevant policies are S-1.3, M-1.2, M-3.3, M-4.3. These policies support efforts and programs that address reducing the risk of natural and man-made hazards and the appropriate disaster response, provide for an interconnected public road network with multiple connections that improve efficiency, provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies, require new development to provide multiple access/egress routes, and require public and private roads to allow for necessary access for fire apparatus and emergency vehicles accommodating outgoing vehicles from evacuating residents. Adherence to these policies will reduce direct impacts to emergency response and evacuation plans from future development.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Haz-3.1 requires coordination between DPLU and the Office of Emergency services to implement and periodically update the Hazard Mitigation Plan. This will ensure planning staff can identify standards that affect future development while OES staff will be able to detect and prevent impediments to emergency response and evacuation plans.
- Haz-3.2 requires the County to implement the Guidelines for Determining Significance, Emergency Response Plans, to ensure that discretionary projects do not adversely impact emergency response or evacuation plans. It also requires the County to apply Public and Private Road Standards to projects. These steps will avoid potential conflicts with adopted emergency response and evacuation plans.
- Haz-3.3 is the preparation of Fire Access Road network plans and incorporation into Community Plans or other documents as appropriate. It also requires the County to implement the Consolidated Fire Code and to require fire apparatus access roads and secondary access in development projects. These measures will ensure that projects are consistent with adopted emergency and evacuation plans.

**Cumulative Impact – Emergency Response and Evacuation Plans:** Cumulative projects, such as development consistent with surrounding jurisdictions general plans, energy projects, or private projects not included in the General Plan Update, would have the potential to impair existing emergency and evacuation plans. This could occur from any of the following: 1) an increase in population that is induced from cumulative projects which are unaccounted for in emergency plans; 2) an increase in population that emergency response teams are unable to service adequately in the event of a disaster; or 3) evacuation route impairment if multiple development projects concurrently block multiple evacuation or access roads. However, cumulative projects would be required to comply with applicable emergency response and evacuation policies outlined in regulations such as the Federal Response Plan, the California Emergency Services Act, and local fire codes. As such, cumulative projects would not result in a significant cumulative impact. Therefore, the proposed General Plan Update, in combination with other cumulative projects, would not contribute to a significant cumulative impact.

## ***HYDROLOGY AND WATER QUALITY***

**A-12 Significant Effect – Erosion or Siltation:** The FEIR identifies significant impacts associated with alteration of drainage patterns that would result in substantial erosion or siltation.

**Mitigation Measures:** Hyd-1.2, Hyd-1.3, Hyd-1.5, Hyd-3.1, Hyd-3.2, and Hyd-3.3.

**Facts in Support of Finding:** Construction activities and impervious surface areas that will result from implementation of the project can alter drainage patterns, either temporarily or permanently. As such, the magnitude and frequency of stream flows can be affected, thereby increasing deposition of pollutants and sediment in County watersheds.

The project includes policies in the Land Use Element and the Conservation and Open Space Element that address potential erosion or siltation associated with alteration of drainage patterns. The relevant policies are LU-6.5, LU-6.9, and COS-5.3. These policies ensure that development minimize the use of impervious surfaces, use Low Impact Development techniques, incorporate best management practices, require new development to conform to the natural topography of the site to utilize natural drainage and topography in conveying stormwater, ensure the protection and maintenance of local watersheds, and require new development to protect downslope areas from erosion. Adherence to these policies will reduce erosion/siltation impacts from future development.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Hyd-1.2 requires the County to implement and revise as necessary the Watershed Protection Ordinance. This Ordinance requires projects to reduce polluted runoff, encourages the removal of invasive species in natural drainages, and help to restore drainage systems to their natural composition and flow rates, thus lowering the amount of erosion and siltation in watersheds.
- Hyd-1.3 requires preparation and implementation of LID standards for new development. These standards minimize runoff and maximize infiltration.
- Hyd-1.5 is the utilization of County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. If such impacts are identified, appropriate mitigation measures are then included in the action.
- Hyd-3.1 requires the County to implement, and revise as necessary, ordinances that require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater. As these restrictions are applied to new projects, drainage patterns will not be adversely affected in ways that lead to erosion and siltation.
- Hyd-3.2 requires the County to implement and revise as necessary the Resource Protection Ordinance to limit development on steep slopes. It also incorporates the Hillside Development Policy into the Resource Protection Ordinance to the extent that it will allow for one comprehensive approach to steep-slope protections. By minimizing development on steep slopes, erosion and siltation impacts will be avoided.
- Hyd-3.3 is the implementation the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability. This ordinance includes many requirements to avoid erosion and siltation, such as: removal of loose dirt; installation of erosion control or drainage devices; inclusion and maintenance of sedimentation basins; planting requirements; slope stabilization measures; provision of drainage calculations; proper irrigation systems; etc.

**Cumulative Impact – Erosion or Siltation:** Cumulative projects identified in this analysis would result in multiple developments that would potentially alter existing drainage patterns in a manner that would result in substantial erosion or siltation. It is reasonably foreseeable that some cumulative projects would occur simultaneously, which would compound the impacts of erosion and siltation and therefore create a significant cumulative impact. Additionally, the project would result in a potentially significant cumulative impact associated with erosion or siltation. However, implementation of the proposed General Plan Update policies and mitigation measures,

in addition to compliance with applicable regulations, would mitigate the project's direct and cumulative impacts to below a level of significance.

**A-13 Significant Effect – Flooding:** The FEIR identifies significant impacts to drainage patterns from future development activities that would result in flooding.

**Mitigation Measures:** Hyd-1.1 through Hyd-1.5, Hyd-2.5, and Hyd-4.1 through Hyd-4.3

**Facts in Support of Finding:** Construction activities and development that will result from implementation of the project can alter drainage patterns, either temporarily or permanently. Such alterations could substantially increase the rate and amount of surface runoff to streams and rivers in a manner which would result in flooding.

The project includes policies in the Land Use Element and Safety Element that address impacts associated with flooding. The relevant policies are LU-6.5, LU-6.10, S-9.2, S-10.2, S-10.3, S-10.4, S-10.6. These policies ensure that development minimizes the use of impervious surfaces, apply Low Impact Development techniques and best management practices, require new development to be located and designed to protect property and residents from hazard risks, require minimization of new development in floodplains require the use of natural channels for County flood control facilities, require flood control facilities to be adequately sized and maintained to operate effectively, require new development to incorporate measures to minimize storm water impacts, and ensure new development maintains the existing area's hydrology. Adherence to these policies will reduce flooding impacts from future development.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Hyd-1.1 requires the County to update and implement the County of San Diego's Jurisdictional Urban Runoff Management Program (JURMP). This program addresses discharge volumes as well as pollutants to help minimize flooding problems.
- Hyd-1.2 requires the County to implement and revise as necessary the Watershed Protection Ordinance. This will reduce polluted runoff, encourage the removal of invasive species in natural drainages, and help to restore drainage systems to their natural composition and flow rates.
- Hyd-1.3 requires preparation and implementation of LID standards for new development. These standards minimize runoff and maximize infiltration, thereby avoiding potential flooding issues.
- Hyd-1.4 requires that the County revise and implement the Stormwater Standards Manual. This document recommends best management practices for land use with



a high potential to contaminate surface water or groundwater resources. This will help reduce flooding as well as improve water quality.

- Hyd-1.5 is the utilization of County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. If such impacts are identified, appropriate mitigation measures are then included in the action to avoid alteration of existing drainage patterns and/or to alleviate potential flooding on or near project sites.
- Hyd-2.5 requires the County to implement and revise as necessary the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains / Floodways to restrict development in flood plains / floodways. This will help prevent potential flooding issues from development activities that would otherwise alter existing drainage patterns.
- Hyd-4.1 requires the County to implement the Flood Damage Prevention Ordinance (Regulatory Code 91.1.105.10) to reduce flood losses in specified areas. This ordinance regulates development within all areas of special flood hazards and areas of flood-related erosion hazards, and establishes policies that minimize public and private losses due to flood conditions.
- Hyd-4.2 requires the County to implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses. This will minimize any alteration of drainage patterns and prevent flooding associated with development projects.
- Hyd-4.3 requires the County to update and implement the following Board Policies: Policy I-68, which establishes procedures for projects that impact floodways; Policy I-45, which defines watercourses that are subject to flood control; and Policy I-56, which permits, and establishes criteria for, staged construction of off-site flood control and drainage facilities by the private sector when there is a demonstrated and substantial public, private or environmental benefit. These policies further minimize potential impacts from flooding by regulating activities in flood-prone areas.

**Cumulative Impact – Flooding:** Cumulative projects would result in land uses and development that would convert permeable surfaces to impermeable surfaces, such as through the construction of buildings, parking lots, and roadways. New development proposed under cumulative projects would have the potential to alter existing drainage patterns, increase the amount of runoff and potentially increase flooding in the San Diego region. Additionally, the project would result in a potentially significant cumulative impact associated with flooding. However, implementation of the proposed General Plan Update policies and mitigation measures, in addition to compliance with applicable regulations, would mitigate the project's direct and cumulative impacts to below a level of significance.

**A-14 Significant Effect – Capacity of Stormwater Systems:** The FEIR identifies significant impacts to stormwater systems and impacts from additional sources of polluted runoff from future development activities.

**Mitigation Measures:** Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-2.5, Hyd-3.1, Hyd-4.1, Hyd-4.2, and Hyd-4.3

**Facts in Support of Finding:** Drainage facilities are designed to prevent flooding by collecting stormwater runoff and directing flows to natural drainage courses and/or away from urban development. If the capacity of existing facilities is exceeded, flooding can occur. The project will result in construction activities and impervious surfaces that can alter drainage patterns and lead to an excess of stormwater runoff. Generation of substantial runoff volumes would have the potential to overload existing drainage facilities and/or provide additional sources of polluted runoff.

The project includes policies in the Land Use Element, Conservation and Open Space Element, and Safety Element that address impacts to stormwater system capacity. The relevant policies are LU-6.5, LU-6.9, COS-4.3, COS-5.2, S-9.2, and S-10.2 through S-10.6. These policies ensure that development minimizes the use of impervious surfaces, apply Low Impact Development techniques and best management practices, require new development to utilize natural drainage and topography in conveying stormwater, require development to maximize stormwater filtration and the natural drainage patterns, require new development to minimize the use of directly connected impervious surfaces, require minimization of new development in floodplains, require the use of natural channels for County flood control facilities, require flood control facilities to be adequately sized and maintained to operate effectively, require new development to minimize storm water impacts, require new development to provide necessary on-site and off-site improvements to storm water runoff and drainage facilities, and ensure that new development maintains the existing area's hydrology. Adherence to these policies will reduce direct impacts to stormwater systems from future development.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Hyd-1.1 requires the County to update and implement the County of San Diego's Jurisdictional Urban Runoff Management Program (JURMP). This program addresses discharge volumes as well as pollutants to help minimize impacts to stormwater systems and avoid flooding problems.
- Hyd-1.2 requires the County to implement and revise as necessary the Watershed Protection Ordinance. This will reduce polluted runoff and help to restore drainage systems to their natural composition and flow rates. As such, the capacity of stormwater drainage systems will not be exceeded.

- Hyd-1.3 requires preparation and implementation of LID standards for new development. These standards minimize runoff and maximize infiltration, which will further alleviate impacts on stormwater drainage facilities.
- Hyd-1.4 is the revision and implementation of the Stormwater Standards Manual, a guidance document for land use activities with a high potential to contaminate surface water or groundwater resources. Application of the measures and practices within the manual will alleviate burdens on existing stormwater systems and minimize sources of polluted runoff.
- Hyd-1.5 is the utilization of County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. If such impacts are identified, appropriate mitigation measures are then included in the action to reduce runoff volumes and improve water quality.
- Hyd-2.5 requires the County to implement and revise as necessary the Resource Protection Ordinance and Policy I-68: Proposed Projects in Flood Plains / Floodways, to restrict development in flood plains / floodways. This will help prevent potential flooding or increased flow in drainage systems.
- Hyd-3.1 requires the County to implement, and revise as necessary, ordinances that require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater. As such, this will minimize stormwater runoff volumes and pollutant sources caused by new development.
- Hyd-4.1 requires the County to implement the Flood Damage Prevention Ordinance (Regulatory Code 91.1.105.10) to reduce flood losses in specified areas. This ordinance regulates development within flood-prone areas, thereby reducing potential overloading of stormwater systems.
- Hyd-4.2 requires the County to implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses. This ordinance includes requirements to minimize runoff and improve water quality.
- Hyd-4.3 requires the County to update and implement the following Board Policies: Policy I-68, Policy I-45, and Policy I-56. These policies work to minimize impacts to floodways, apply flood-control measures, and regulate flood control and drainage facilities, respectively. As such, exceedance of stormwater systems from increased runoff would be further reduced or avoided.

**Cumulative Impact – Capacity of Stormwater Systems:** Many of the cumulative projects included in the analysis are proposed to accommodate the expected population growth within the region. Impermeable surfaces, constructed under implementation of cumulative projects, would have the potential to contribute substantial quantities of runoff which would exceed the capacity of existing stormwater drainage systems, while contributing to substantial additional sources of polluted runoff. However, a cumulative project that would exceed the capacity of a stormwater system would be unlikely to contribute to a cumulative impact because the area of exposure would be limited to the immediate surrounding area. Additionally, the majority of cumulative projects would be subject to CEQA and/or NEPA review, and local regulations that require development to construct or retrofit stormwater drainage systems so that they would not cause flooding. A significant cumulative impact would not occur. Therefore, the project, in combination with the identified cumulative projects, would not contribute to a significant cumulative impact associated with the capacity of stormwater systems.

**A-15 Significant Effect – Housing within a 100-year Flood Hazard Area:** The FEIR identifies significant impacts associated with placement of housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

**Mitigation Measures:** Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, and Hyd-6.1

**Facts in Support of Finding:** Flooding can inundate and cause damage to structures, sometimes resulting in loss of life, loss of property, health and safety hazards, disruption of services, and infrastructure damage. It is estimated that the project includes approximately 2,824 acres of village residential, 15,282 acres of semi-rural residential, and 19,925 acres of rural land uses within flood areas.

The project includes policies in the Land Use Element, the Conservation and Open Space Element, and the Safety Element that address potential flood hazards. The relevant policies are LU-6.12, COS-5.1, S-9.1 through S-9.5, and S-10.1. These policies require the documenting and annual review of areas within floodways, restrict development in floodways and floodplains, prohibit development in various areas with increased flooding hazards, and limit new and expanded land uses within floodways. Adherence to these policies will reduce impacts from future development associated with placement of housing in flood hazard areas.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Hyd-1.2 requires the County to implement and revise as necessary the Watershed Protection Ordinance. Application of this ordinance requires measures to avoid flooding and would help prevent placement of housing in a 100-year flood hazard area by requiring specific safety precautions before allowing such development.

- Hyd-1.5 is the utilization of County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. This would include the identification of housing within flood hazard areas. If this situation were identified, appropriate mitigation measures would then be included in the action to avoid potential flooding problems.
- Hyd-2.5 requires the County to implement and revise as necessary the Resource Protection Ordinance and Policy I-68: Proposed Projects in Flood Plains / Floodways, to restrict development in flood plains / floodways. These regulations specifically prevent the placement of housing within flood hazard areas.
- Hyd-4.1 requires the County to implement the Flood Damage Prevention Ordinance (Regulatory Code 91.1.105.10). This ordinance regulates development within flood-prone areas, thereby preventing placement of housing in flood-hazard areas.
- Hyd-4.2 requires the County to implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses. Since this would also apply to activities related to residential development, this ordinance reduced potential impacts associated with housing development in 100-year flood hazard areas.
- Hyd-6.1 requires that the County implement the Resource Protection Ordinance to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological and drainage problems. As such, any proposed housing projects that are subject to this ordinance would be required to avoid flood-hazard areas.

**Cumulative Impact – Housing within a 100-year Flood Hazard Area:** Cumulative projects, such as those proposed in adjacent city and county general plans, could potentially place housing within a 100-year flood hazard area. However, cumulative projects in California would be required to conform with applicable regulations, such as National Flood Insurance Act, National Flood Insurance Reform Act, and Cobey-Alquist Floodplain Management Act, which prohibit housing from being placed in floodways. Due to existing regulations, a cumulative impact would not occur. Therefore, the project, in combination with the identified cumulative projects, would not result in a significant cumulative impact associated with housing within a flood hazard area.

**A-16 Significant Effect – Impeding or Redirecting Flood Flows:** The FEIR identifies significant impacts associated with the placement of structures within a 100-year flood hazard area which would impede or redirect flood flows.

**Mitigation Measures:** Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, Hyd-4.3, and Hyd-6.1

**Facts in Support of Finding:** Structures that encroach on a floodplain, such as bridges, can increase upstream flooding by narrowing the width of the channel and increasing the channel's resistance to flow. The project proposes the following land use designations in areas within a floodplain or floodplain fringe: village residential, 2,819 acres; village core mixed use, less than one acre; neighborhood commercial, 3 acres; general commercial, 269 acres; limited impact industrial, 167 acres; medium impact industrial, 192 acres; and high impact industrial, 71 acres. These land uses have the potential to contain structures that would impede or redirect flood flows.

The project includes policies in the Land Use Element, Conservation and Open Space Element, and Safety Element that address development within potential flood hazard areas. The relevant policies are LU-6.12, COS-5.1, S-9.1 through S-9.5, and S-10.1. These policies require the documenting and annual review of areas within floodways, restrict development in floodways and floodplains, manage development based on Federal floodplain maps, require minimization of new development in floodplains, require new development within mapped flood hazard areas be sited and designed to minimize on-site and off-site hazards due to flooding, allow development within the floodplain fringe in semi-rural and rural lands only when environmental impacts and hazards are mitigated, and limit new or expanded land uses within floodways. Adherence to these policies will reduce impacts associated with impediments to flows or redirection of flows from future development.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Hyd-1.2 requires the County to implement and revise as necessary the Watershed Protection Ordinance. Application of this ordinance requires measures to avoid flooding and would help prevent placement of structures in a 100-year flood hazard area.
- Hyd-1.5 is the utilization of County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. This would include the identification of potential impediments to flows or alteration of drainage patterns within flood hazard areas. If this situation were identified, appropriate mitigation measures would then be included in the action to avoid potential flooding problems.
- Hyd-2.5 requires the County to implement and revise as necessary the Resource Protection Ordinance and Policy I-68: Proposed Projects in Flood Plains / Floodways, to restrict development in flood plains / floodways. These regulations specifically prevent the placement of housing within flood hazard areas.

- Hyd-4.1 requires the County to implement the Flood Damage Prevention Ordinance (Regulatory Code 91.1.105.10). This ordinance regulates development within flood-prone areas, thereby preventing impediments to flood flows.
- Hyd-4.2 requires the County to implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses. This would apply to activities that would impede or redirect flood flows.
- Hyd-4.3 requires the County to update and implement the following Board Policies: Policy I-68, Policy I-45, and Policy I-56. These policies work to minimize impacts to floodways, apply flood-control measures, and regulate flood control and drainage facilities, respectively. Such provisions would also prevent the redirection or impediment of flows in flood-hazard areas.
- Hyd-6.1 requires that the County implement the Resource Protection Ordinance to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological and drainage problems. The provisions of this ordinance further prevent placement of structures in areas that that could impede or redirect flows.

**Cumulative Impact – Impeding or Redirecting Flood Flows:** Cumulative projects included in this analysis have the potential to place residential land uses, commercial land uses, industrial land uses and various other land uses, with the potential to contain structures, within a 100-year flood plain. Placing structures within a 100-year flood plain would impede or redirect flood flows, thereby causing a significant impact. However, it is expected that most cumulative projects in California would be required to comply with applicable regulations that would prevent the construction of structures in floodways, such as the National Flood Insurance Act, National Flood Insurance Reform Act, Cobey-Alquist Floodplain Management. Therefore, it is expected that through regulation, a cumulative impact would not occur. The project, in combination with the identified cumulative projects, would not result in a significant impact associated with impeding or redirecting flood flows.

**A-17 Significant Effect – Dam Inundation and Flood Hazards:** The FEIR identifies significant impacts associated with the exposure of people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

**Mitigation Measures:** Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, Hyd-4.3, Hyd-6.1, Hyd-8.1, and Hyd-8.2

**Facts in Support of Finding:** Within the unincorporated County there are approximately 31 dams that pose inundation risk in the event of a breach or failure. Approximately 56,000 acres of unincorporated County land would be subject to flooding and inundation

as a result of dam failure. Of this amount, about 10,000 acres would be designated for high density land uses under the project, and would therefore have a high risk of loss of life or property from flooding due to dam inundation.

The project includes policies in the Conservation and Open Space Element and the Safety Element that address development within flood hazard areas and dam inundation zones. The relevant policies are COS-5.1, S-9.1 through S-9.3, S-9.6, and S-10.1. These policies restrict development in floodways and floodplains, manage development based on Federal floodplain maps, require minimization of new development in floodplains, require new development within mapped flood hazard areas be sited and designed to minimize on-site and off-site hazards, prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans, and limit new or expanded land uses within floodways. Adherence to these policies will reduce potential impacts from the placement of future development in flood hazard areas and/or dam inundation areas.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Hyd-1.2 requires the County to implement and revise as necessary the Watershed Protection Ordinance. Application of this ordinance requires measures to avoid flooding and would minimize potential exposure of people or structures to flood hazards.
- Hyd-1.5 is the utilization of County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. This would include the identification of potential exposure of people or structures to floods or inundation. If such a situation were identified, appropriate mitigation measures would then be included in the action to avoid potential risk of loss.
- Hyd-2.5 requires the County to implement and revise as necessary the Resource Protection Ordinance and Policy I-68: Proposed Projects in Flood Plains / Floodways, to restrict development in flood plains / floodways. These regulations, therefore, also minimize potential exposure of people or structures to flooding and inundation.
- Hyd-4.1 requires the County to implement the Flood Damage Prevention Ordinance (Regulatory Code 91.1.105.10). This ordinance regulates development within flood-prone areas and minimizes potential risks to people and structures from flooding or inundation hazards.
- Hyd-4.2 requires the County to implement the Grading, Clearing and Watercourses Ordinance. The provisions of this ordinance require that flood hazard areas or areas



of inundation be avoided, or otherwise made safe, prior to grading/clearing for development. This would further minimize exposure of people or structures to flooding and inundation.

- Hyd-4.3 requires the County to update and implement the following Board Policies: Policy I-68, Policy I-45, and Policy I-56. These policies include provisions to minimize impacts to floodways, apply flood-control measures, and regulate flood control and drainage facilities, respectively. Continuation of these policies will further minimize potential flooding and dam inundation hazards.
- Hyd-6.1 requires that the County implement the Resource Protection Ordinance to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological and drainage problems. As such, this ordinance limits development that would expose people or structures to flooding or inundation.
- Hyd-8.1 requires the County to perform regular inspections and maintenance of County reservoirs to prevent dam failure. This measure would minimize the potential for inundation of the surrounding area or zone and prevent losses or injuries.
- Hyd-8.2 requires that the County review discretionary projects for dam inundation hazards through application of the County's Guidelines for Determining Significance for Hydrology and Guidelines for Determining Significance for Emergency Response Plans. These guidelines help identify potential flooding and inundation hazards and apply methods for avoiding or mitigating those hazards.

**Cumulative Impact – Dam Inundation and Flood Hazards:** It is reasonably foreseeable that cumulative projects would place housing or structures within dam inundation areas, thereby increasing the potential for a significant risk of loss, injury or death involving flooding. However, multiple regulations exist, such as the National Flood Insurance Act, National Flood Insurance Reform Act, Cobey-Alquist Floodplain Management Act, and local regulations that would be expected to mitigate any potential impacts to below a level of significance. A cumulative impact would not occur. Therefore, the project, in combination with the identified cumulative projects, would not contribute to a significant cumulative impact associated with dam inundation and flood hazards.

**A-18 Significant Effect – Seiche, Tsunami and Mudflow Hazards:** The FEIR identifies significant impacts that would expose people or structures to a significant risk of loss, injury, or death from mudflow hazards.

**Mitigation Measures:** Hyd-3.1, Hyd-3.2, and Hyd-3.3

**Facts in Support of Finding:** Potential impacts associated with tsunamis or seiches are considered to be less than significant for the project. However, mudflows are the most common disasters in San Diego, and the project area is particularly susceptible to flash floods and debris flows during rainstorms. Residential, commercial and industrial land uses, as designated under the project, increase the risk of exposing people or structures to damage in the event of a mudflow.

The project includes policies in the Conservation and Open Space Element and the Safety Element that address potential mudflow hazards. The relevant policies are COS-5.1, S-8.1, S-8.2, S-9.3, and S-9.6. These policies restrict development in floodways and floodplains, reduce landslide risks to development, prohibit development from contributing or causing slope instability, require minimization of development in flood hazard areas, and prohibit development in dam inundation areas. Adherence to these policies will reduce impacts to people or structures from mudflows.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Hyd-3.1 requires the County to implement and revise as necessary ordinances to require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater. These provisions will minimize development that exposes people and property to mudflow hazards.
- Hyd-3.2 requires the County to implement and revise as necessary the Resource Protection Ordinance to limit development on steep slopes. It also incorporates the Hillside Development Policy into the Resource Protection Ordinance to the extent that it will allow for one comprehensive approach to steep-slope protections. By minimizing development on steep slopes, risks of loss, injury or death from mudflows will be prevented.
- Hyd-3.3 is the implementation the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability. These protections will reduce potential mudflows around people and structures.

**Cumulative Impact – Seiche, Tsunami and Mudflow Hazards:** Cumulative projects in surrounding jurisdictions on the coast have the potential to expose people or structures to loss, injury or death involving inundation of a tsunami, due to the inherent risk involved with coastal development. However, the project has no risk of tsunami and so it would not contribute to a cumulative impact. Additionally, cumulative projects would be located in the vicinity of natural water bodies that have the potential to be affected by a seiche, thereby exposing people and structures to flooding from this natural disaster. Mudflows would also potentially affect cumulative projects, especially in surrounding jurisdictions

that have been affected by the extreme wildfire events in the recent past. However, the majority of cumulative projects would be subject to CEQA and/or NEPA review, in addition to compliance with applicable regulations such as the National Flood Insurance Act, National Flood Insurance Reform Act, Cobey-Alquist Floodplain Management Act and local regulations, and impacts would be reduced to a level below significant. A cumulative impact would not occur. Therefore, the project, in combination with the identified cumulative projects, would not contribute to a significant cumulative impact associated with seiche, tsunami, and mudflow hazards.

## **LAND USE**

**A-19 Significant Effect – Physical Division of an Established Community:** The FEIR identifies significant impacts associated with the physical division of an established community.

**Mitigation Measures:** Lan-1.1 through Lan-1.3

**Facts in Support of Finding:** Large multi-lane roads associated with the project would have the potential to divide an established community. In addition, roadways that are proposed for widening may also divide a community by limiting access across the road. The project includes new roads, road extensions, and roadway widenings. Communities that may be affected by the road network include Bonsall, San Dieguito, Ramona, Valle de Oro, and Alpine.

The project includes policies in the Land Use Element, Mobility Element, and Housing Element that address community character and compatibility for future development and infrastructure. The relevant policies are LU-1.4, LU-2.1, LU-2.3, LU-2.5, LU-4.1, LU-4.2, LU-4.3, LU-4.4, LU-11.2, LU-12.4, M-10.6, M-1.3, and H-2.1. These policies require future circulation improvements and developments to be consistent with the character of an established community, require road design considerations that avoid bisecting communities or town centers, support conservation-oriented project design when consistent the applicable community plan, require certain residential subdivisions to conserve open space and natural resources, require incorporation of natural features into proposed development, require contiguous open space areas, require new development to conform to the natural topography, require new residential development to be integrated with existing neighborhoods, and require the location and development of private roads to minimize visual impacts. Adherence to these policies will reduce potential impacts associated with physical division of established communities from future development and infrastructure.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Lan-1.1 requires coordination with adjacent cities and other agencies regarding planning efforts and resource protection. It specifically requires coordination with SANDAG during updates to the Regional Transportation Plan to ensure that regional roads are properly planned, sited, and designed. Consultation and coordination with this and other agencies will allow better planning of infrastructure and prevent significant impacts to communities from incompatible facilities.
- Lan-1.2 requires coordination with land owners, other departments, and community groups to ensure that both public and private development projects and associated infrastructure minimize impacts to established communities. This involves community input and General Plan conformance reviews on County road projects to insure that County road planning and development is consistent with the General Plan. This also includes analysis of potential environmental impacts for public and private road projects and application of mitigation measures pursuant to CEQA. Department of Public Works policies and procedures shall be evaluated to ensure that such reviews are conducted and that issues regarding potential division of communities are identified and addressed. General Plan Amendments that propose changes to the circulation network shall be kept consistent with the General Plan Goals and Policies, and such proposals will also be reviewed by the communities. In addition, Board Policy I-63, which contains provisions for General Plan Amendments, and/or department procedures will be updated to meet this standard.
- Lan-1.3 requires the County to maintain plans and standards for infrastructure and roads so that divisions of communities do not occur. This will include: 1) updates to County Road Standards to ensure that roads are designed and built in a safe manner consistent with the General Plan and community context; 2) adherence to Community Plans to guide infrastructure planning in the individual and unique communities of the County; 3) evaluation and, if necessary, revisions to the subdivision ordinance to ensure future project designs, and corresponding infrastructure designs, are consistent with the General Plan and with established community character; 4) preparation of local public road network plans to improve mobility, connectivity, and safety; and 5) preparation of community road standards that supplement the County road standards in order to recognize the unique constraints and character of different communities. These efforts will minimize the potential impacts of future infrastructure on established communities.

**Cumulative Impact – Physical Division of an Established Community:** Cumulative projects would include the construction of new or widened roadways, airports, railroad tracks, open space areas, or other features that would individually have the potential to physically divide an established community. In addition to these larger projects, smaller cumulative projects could have the effect of providing a barrier to access that would physically divide a community. Such impacts would generally be limited to an individual community. Multiple projects in the same community could combine to result in a cumulative effect to the division of that community. The General Plan Update has the

potential to contribute to this cumulative impact only as it pertains to new roads, road extensions and roadway widenings because other land uses that could divide a community, such as a railroads and airports are not proposed in the General Plan Update and, large open space areas are not proposed in areas that would affect established communities. In addition, the project would result in a potentially significant impact. However, implementation of the proposed General Plan Update policies and mitigation measures described above would mitigate the direct and cumulative impacts to below a level of significance.

## **NOISE**

**A-20 Significant Effect – Excessive Noise Levels:** The FEIR identifies significant impacts related to the exposure of any existing or reasonably foreseeable future noise sensitive land uses to exterior or interior noise, including existing and planned Mobility Element roadways, railroads, and all other noise sources.

**Mitigation Measures:** Noi-1.1 through Noi-1.9

**Facts in Support of Finding:** Roadway systems are the most predominant source of noise exposure in the County, followed by airport noise and rail operations. Noise contours in the DEIR identify decibel levels as well as land uses that would be acceptable in those contours. It also identifies areas near freeways and major arterials that have the potential to be exposed to excessive noise levels. Based on the analysis, the project would accommodate development of land uses that exceed the noise levels deemed as “Acceptable” in the noise compatibility guidelines. The project also designates noise sensitive land uses in areas exceeding the 60 Ldn railroad noise contour.

The project includes policies in the Land Use Element, the Mobility Element, and the Noise Element that address excessive noise level impacts. The relevant policies are LU-2.8, M-1.3, M-2.4, N-1.4, N-1.5, N-2.1, N-2.2, N-4.1, N-4.3, N-4.2, N-4.5, N-4.7, and N-4.8. These policies require preparation of an acoustical study where development has the potential to directly result in noise sensitive land uses being subject to excessive noise levels, require a solid noise barrier be incorporated into development design when the exterior noise level on patios or balconies would be excessive, ensure that increases in average daily traffic do not substantially increase cumulative traffic noise to noise sensitive land uses, require inclusion of traffic calming design that minimizes traffic noise; promote the location of new or expanded roads where the impact to noise sensitive land uses would be minimized, require coordination with other agencies to minimize impacts to noise sensitive land uses from railroad operations, promote establishment of train horn “quiet zones,” require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, and incorporate buffers or other noise reduction measures into the siting and design of roads

located next to sensitive noise receptors. Adherence to these policies will reduce exposure of noise sensitive land uses to exterior and interior noise impacts.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Noi-1.1 requires an acoustical analysis whenever development may result in any existing or future noise sensitive land uses being subject to on-site noise levels of 60 dBA (CNEL) or greater, or other land uses that may result in noise levels exceeding the “Acceptable” standard in the Noise Compatibility Guidelines. The analysis will determine whether significant impacts may occur and incorporate attenuation measures within the project to meet the compatibility guidelines.
- Noi-1.2 is the revision of Guidelines for Determining Significance - Noise for new developments where the exterior noise level on patios or balconies for multi-family residences or mixed-use development exceeds 65 dBA (CNEL); a solid noise barrier is incorporated into the building design of balconies and patios for units that exceed 65 dBA (CNEL) while still maintaining the openness of the patio or balcony. This measure will alleviate excessive noise level impacts on residents while meeting compatibility guidelines.
- Noi-1.3 requires that an acoustical study be done for projects proposing amendments to the County General Plan Land Use Element and/or Mobility Element when a significant increase to the average daily traffic is proposed compared to traffic anticipated in the General Plan. This measure will identify unanticipated noise level increases for sensitive land uses and allow appropriate project revisions or mitigation to be identified.
- Noi-1.4 is the revision of the Guidelines for Determining Significance - Noise standard mitigation and project design considerations to promote traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise. These mitigation and design standards will minimize potential noise impacts on noise-sensitive land uses.
- Noi-1.5 requires coordination with Caltrans and SANDAG as appropriate to identify and analyze appropriate route alternatives that may minimize noise impacts to noise sensitive land uses within the unincorporated areas of San Diego County.
- Noi-1.6 requires coordination with SANDAG, MTS, California High-Speed Rail Authority as appropriate, and passenger and freight train operators to install noise attenuation features to minimize impacts to adjacent residential or other noise sensitive land uses.

- Noi-1.7 requires coordination with project applicants during the scoping phase of proposed projects to take into consideration impacts resulting from on-site noise generation to noise sensitive land uses located outside the County's jurisdictional authority. The County will notify and coordinate with the appropriate jurisdiction(s) to determine appropriate project design techniques and/or mitigation. This will prevent cumulatively considerable noise impacts to surrounding jurisdictions.
- Noi-1.8 is the implementation of procedures (or cooperative agreements) with Caltrans, the City of San Diego, and other jurisdictions as appropriate to ensure that a public participation process or forum is available for the affected community to participate and discuss issues regarding transportation generated noise impacts for new or expanded roadway projects that may affect noise sensitive land uses within the unincorporated areas of San Diego County.
- Noi-1.9 is the coordination with Caltrans, the County Landscape Architect, and community representatives (e.g., Planning or Sponsor Group) to determine the appropriate noise mitigation measures (planted berms, noise attenuation barriers or a combination of the two) to be required as a part of the proposals for roadway improvement projects. It also requires that the County's Five Year Capital Improvement Program and Preliminary Engineering Reports address noise impacts and include appropriate mitigation measures for road improvement projects within or affecting the unincorporated area of the County.

**Cumulative Impact – Excessive Noise Levels:** A cumulative noise impact would occur if construction and operation associated with cumulative regional land use projects, such as those identified in adjacent city and county general plans and regional transportation plans, combined would exceed the noise compatibility guidelines and standards of the Noise Element. In addition, the project would have the potential to contribute to a potentially significant cumulative impact associated with excessive noise levels. However, implementation of the proposed General Plan Update policies, and corresponding mitigation measures would mitigate these impacts to a level below significant.

**A-21 Significant Effect – Excessive Groundborne Vibration:** The FEIR identifies significant impacts related to the exposure of vibration sensitive uses to ground-borne vibration and noise equal to or in excess of the levels shown in Table 2.11-14, Groundborne Vibration and Noise Standards, or if new sensitive land uses would be located in the vicinity of ground-borne vibration inducing land uses such as railroads or mining operations.

**Mitigation Measures:** Noi-1.7, and Noi-2.1 through Noi-2.4

**Facts in Support of Finding:** Potential sources of groundborne vibration include construction, railroads, and extractive mining operations. Additionally, groundborne vibration has the potential to occur as a result of new land use development

accommodated by the General Plan Update. Based on the range of distances that groundborne vibration travels from these sources, and the potential for vibration sensitive land use types to be within range, the General Plan Update would potentially result in significant impacts.

The project includes policies in the Noise Element that address groundborne vibration impacts. The relevant policies are N-3.1, N-4.7, N-5.2, N-6.3, and N-6.4. These policies require the use of Federal Transit Administration and Federal Railroad Administration guidelines to limit the extent of exposure that sensitive uses have the potential to have to groundborne vibration from potential sources, require the County to work with SANDAG, Metropolitan Transit Services and passenger and freight rail operators to minimize impacts to residential and other sensitive land uses, require location of industrial facilities in areas that would minimize impacts to sensitive land uses, require development to limit the frequency of use of high-noise equipment, and require development to limit the hours of operation as appropriate for non-emergency noise-producing activities such as: construction, maintenance, trash collection, and parking lot sweeper activity. Adherence to these policies will reduce exposure of vibration sensitive land uses to sources of groundborne vibration.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Noi-1.7 requires coordination with project applicants during the scoping phase of proposed projects to take into consideration impacts resulting from on-site noise generation to noise sensitive land uses located outside the County's jurisdictional authority. The County will notify and coordinate with the appropriate jurisdiction(s) to determine appropriate project design techniques and/or mitigation. This will prevent cumulatively considerable noise and vibration impacts to surrounding jurisdictions.
- Noi-2.1 requires a ground-borne vibration technical study for projects that are in certain land use designations and within a certain distance of the Sprinter Rail Line. The specific screening criteria are provided in Table 4 of the County of San Diego Guidelines for Determining Significance - Noise. If significant impacts are determined based on the technical study, mitigation measures or design features will be required as part of the project.
- Noi-2.2 requires revisions to the County of San Diego Guidelines for Determining Significance - Noise to reflect limits in the Noise Compatibility Guidelines and Noise Standards [Policy N-3.1] from the General Plan Update. This measure also requires the County to periodically review the Guidelines to incorporate standards for minimizing effects of groundborne vibration during project operation or construction.
- Noi-2.3 requires that industrial facility projects be reviewed to ensure they are located in areas that would minimize impacts to noise-sensitive land uses. It further



requires revisions to the County of San Diego Guidelines for Determining Significance - Noise to incorporate appropriate noise attenuation measures for minimizing industrial-related noise. This will prevent direct and cumulative groundborne vibration impacts to sensitive land use types.

- Noi-2.4 requires that an acoustical study accompany extractive mining projects that may affect noise-sensitive land uses. Similarly, it requires an acoustical study for noise-sensitive land use projects proposed near existing extractive land use facilities. The results of the acoustical study may require a “buffer zone” or other mitigating features to ensure that potential vibration impacts are not significant.

**Cumulative Impact – Excessive Groundborne Vibration:** A cumulative ground-borne vibration impact would occur if one or more cumulative projects would exceed the FTA and Federal Railroad Administration guidelines for groundborne vibration and noise. However, there are no specific plans or time scales for individual construction projects. Therefore, it is not possible to determine exact vibration levels, locations, or time periods for construction. Potential vibration impacts from construction would need to be analyzed on a case-by-case basis. Therefore, cumulative projects have the potential to result in a significant cumulative impact if they were located in close proximity to one another and construction of multiple cumulative projects were to occur at the same time. In addition, the project would have the potential to contribute to a potentially significant cumulative impact associated with excessive groundborne vibration. However, implementation of the proposed General Plan Update policies and mitigation measures would reduce the project’s potential direct impact and contribution to a cumulative impact to a less than significant level.

**A-22 Significant Effect – Temporary Increase in Ambient Noise Levels:** The FEIR identifies significant impacts related to the substantial temporary or periodic increase in ambient noise levels during construction which, together with noise from all sources, would exceed the standards listed in San Diego County Code Sections 36.408 and 36.409.

**Mitigation Measures:** Noi-4.1 and Noi-4.2

**Facts in Support of Finding:** Future development under the General Plan Update will necessitate construction activities, such as site grading, truck/construction equipment movement, engine noise, rock excavation, rock crushing, and blasting. Noise generated from these activities, when combined with all other noise in the given area, has the potential to exceed Noise Ordinance standards. In addition, areas of dense development under the General Plan Update have the potential to experience significant nuisance noise from sources such as amplified music, public address systems, barking dogs, landscape maintenance, or stand-by power generators.

The project includes policies in the Noise Element that address temporary and/or nuisance noise. The relevant policies are N-6.1 through N-6.6. Adherence to these policies will reduce impacts related to temporary or periodic increases in ambient noise levels by enacting ordinances to regulate impacts from noise and enforce noise regulations to ensure no violations of noise standards occur.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Noi-4.1 requires Noise Ordinance and Zoning Ordinance review and revision as necessary to ensure appropriate restrictions for intermittent, short-term, or other nuisance noise sources. This will ensure that mechanisms are in place to enforce limits on temporary noise impacts.
- Noi-4.2 requires that the County maintain staff and equipment as appropriate to facilitate enforcement of the Noise Ordinance. This will ensure that temporary noise impacts can be regulated immediately when identified.

**Cumulative Impact – Temporary Increase in Ambient Noise Levels:** A cumulative noise impact would occur if construction associated with one or more projects in close proximity to one another would result in combined noise levels that would temporarily increase ambient noise levels beyond the standards in the County Noise Ordinance. However, since there are no specific plans or time scales for individual projects, it is not possible to determine exact noise levels, locations, or time periods for construction. Additionally, projects would have to be constructed in close proximity to each other to result in a cumulative impact. Construction projects in incorporated jurisdictions would be subject to noise standards and limits for the jurisdiction in which they are proposed. Projects proposed in the Country of Mexico along the U.S./Mexico international border and on tribal lands would not be subject to County of San Diego noise regulations and standards; however, potential construction noise-related impacts in these areas would be temporary and limited to the area immediately surrounding the project. Similarly, a cumulative nuisance noise impact would occur if noise associated with one or more land uses in an area would result in combined noise levels that would temporarily increase ambient noise levels beyond the standards in the County Noise Ordinance. However, these events would be short-term and event-specific in nature. Therefore, a potentially significant cumulative impact associated with temporary increase in ambient noise levels would not occur. The project would not contribute to a significant cumulative impact.

**A-23 Significant Effect – Excessive Noise Exposure from a Public or Private Airport:**

The FEIR identifies significant impacts related to the exposure of people residing or working in the project area to excessive noise levels from a public airport or private.

**Mitigation Measures:** Noi-5.1 through Noi-5.3

**Facts in Support of Finding:** Under the General Plan Update, a total of 1,650 acres of land uses with the potential to result in the development of noise sensitive land uses would be located within the 60 dBA annual CNEL noise contour of a public airport. In addition, approximately 195,000 acres of land within two miles of a private airstrip is designated for land uses that may include noise sensitive land uses (a two-mile distance is used since noise contours have not been established for private airports). Public airports and private airstrips would have the potential to result in excessive noise impacts to noise sensitive land uses from activities such as aircraft takeoffs and landings.

The project includes policies in the Noise Element and Safety Element that address noise exposure from public or private airports. The relevant policies are N-4.9, S-15.1, S-15.2, and S-15.4. These policies assure the noise compatibility of development that would have the potential to be affected by noise from public or private airports and helipads during project review, require land uses surrounding airports to be compatible with airport operations, require operational plans for new and existing airports to be compatible with land uses that surround the airport facility, ensure that private airstrips and heliports are located outside of the safety zones and flight paths of existing airports, and require land uses surrounding airports to be compatible with airport operations. Adherence to these policies will reduce excessive noise impacts to people in the project area from public and private airports.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Noi-5.1 requires use of the applicable Airport Land Use Compatibility Plan's (ALUCP) as guidance/reference during development review of projects that are planned within an Airport Influence Area (AIA). In addition, any projects that are within the AIA are required to be submitted to the SDCRAA for review. This will help ensure that incompatible land uses are not developed in areas of excessive noise exposure from airports.
- Noi-5.2 requires that private airport or heliport uses proposed in the County unincorporated are evaluated for potentially significant noise impacts and for consistency with the FAA standards. This will minimize potential noise exposure associated with private airports.
- Noi-5.3 requires that the County consult with the FAA standards and the County Noise Ordinance as a guide for assessing noise impacts from private airports and helipads. This will minimize potential noise exposure associated with private airports and helipads.

**Cumulative Impact – Excessive Noise Exposure from a Public or Private Airport:** A cumulative noise impact would occur if construction and operation associated with

cumulative regional land use projects, such as those identified in adjacent city and county general plans and regional transportation plans, when combined would result in the exposure of noise sensitive land uses to excessive noise from a public or private airport. Even though required regulations would minimize the cumulative impact of projects in the U.S, development in Mexico along the U.S./Mexico international border or on tribal lands within the vicinity of existing noise sensitive land uses would not be required to comply with the same noise standards and a potentially significant cumulative impact would occur. In addition, the project would have the potential to contribute to a potentially significant cumulative impact associated with excessive noise exposure from airports. However, implementation of the proposed General Plan Update policies and corresponding implementation projects, in addition to compliance with the 1990 California Airport Noise Standards and applicable ALUCPs, would reduce potential direct and cumulative impacts to a less than significant level.

## **PUBLIC SERVICES**

**A-24 Significant Effect – Fire Protection Services:** The FEIR identifies significant impacts related to the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.

**Mitigation Measures:** Pub-1.1 through Pub-1.9, as well as other measures listed in Sections 2.1 through 2.17 of the EIR related to specific resources that may be adversely affected by construction of fire protection facilities.

**Facts in Support of Finding:** Under the proposed General Plan Update, the travel times for emergency fire response would be required to achieve standards provided in the Safety Element, and acceptable service ratios would need to be maintained for the various fire districts. To consistently meet such standards during build-out, the construction or expansion of new fire facilities will be required, which would have the potential to result in substantial adverse impacts to the environment.

The project includes policies in the Land Use Element and Safety Element that address fire protection services. The relevant policies are LU-1.4, LU-6.4, LU-6.11, LU-12.3, LU-12.4, S-3.4, S-5.1, S-5.2, and S-6.1 through S-6.5. Adherence to these policies will minimize deterioration of fire agency response times and will ensure that environmental impacts related to the construction or expansion of additional facilities will be mitigated.

Mitigation measures identified in Chapters 2.1 through 2.17 of the EIR would also mitigate direct and cumulative impacts related to the construction or expansion of fire protection facilities. Mitigation measures listed in these sections require that the development of new or expanded facilities be evaluated pursuant to the environmental resource(s) potentially affected. In addition, the following mitigation measures would also

contribute to reducing impacts related to the construction or expansion of fire protection facilities to below a level of significance:

- Pub-1.1 is the participation in interjurisdictional reviews to gather information on and review and provide comments on plans for new or expanded governmental facilities in the region. This will ensure that potential environmental impacts associated with new or expanded public services are identified and adequately mitigated and will ensure that new or expanded facilities are appropriately located.
- Pub-1.2 requires that the County plan and site governmental facilities that are context-specific according to their location in village, semi-rural, or rural lands. This will minimize potential environmental effects that result from incompatible uses (e.g., visual impacts, noise impacts, groundwater impacts, etc.).
- Pub-1.3 is the revision of Board Policy I-63 to minimize leapfrog development and to establish specific criteria for General Plan Amendments proposing expansion of areas designated Village regional category. This is intended to limit unexpected demands for new or expanded public services and the associated governmental facilities.
- Pub-1.4 requires that General Plan Amendments be reviewed for consistency with the goals and policies of the General Plan such that future development in hazardous wildfire areas will be limited to low-density land uses that do not necessitate extensive new fire protection facilities.
- Pub-1.5 is the implementation, and revision if necessary, of Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. This measure also requires that commitments from fire protection districts demonstrate that acceptable travel times can be met in accordance with the General Plan. By ensuring that development projects have adequate fire service, the need for new or expanded facilities can be minimized.
- Pub-1.6 is the continued use of the County GIS and the County Guidelines for Determining Significance to identify fire prone areas during the review of development projects. This measure further mandates that development proposals meet requirements set by the fire authority having jurisdiction (FAHJ) and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review. This will minimize the need for new or expanded facilities, and will ensure that impacts are analyzed and mitigated when new or expanded facilities are required.
- Pub-1.7 requires enforcement of the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and

their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues. This will minimize the need for new fire protection facilities to accommodate new development.

- Pub-1.8 requires that the County complete CEQA reviews for environmental impacts on new public facilities (fire, sheriff, libraries, etc.) or significant expansions of such facilities. It also requires mitigation of environmental impacts associated with such facilities to the extent feasible.
- Pub-1.9 requires the County to establish and implement procedures that ensure new development projects fund their fair share toward fire services facilities. This may include development of a long-term financing mechanism, such as an impact fee program or community facilities development, as appropriate. This measure further continues the requirement that large development projects provide their fair share contribution to fire services either by providing additional funds and/or development of infrastructure. This measure will ensure that new or expanded fire protection facilities will be correlated with the need for such services and that impacts from their construction will be addressed with mitigation identified early in the process.

**Cumulative Impact – Fire Protection Services:** Fire protection services within the region often cross inter-jurisdictional boundaries. Cumulative projects would result in a need for additional fire protection services to serve new development. Cumulative projects proposed under general plans of surrounding cities and counties, such as commercial, residential or industrial projects, would require fire protection services from fire agencies within the region. While the majority of cumulative fire protection projects would undergo environmental review, and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for fire services, which would have the potential to result in a significant cumulative impact. Therefore, cumulative projects would result in a significant cumulative impact associated with the construction of fire facilities. Implementation of the proposed General Plan Update would have the potential to result in a significant impact. However, implementation of the proposed General Plan Update policies and mitigation measures described above and in Sections 2.1 through 2.17 of the EIR would reduce potentially significant direct and cumulative impacts to below a level of significance. Therefore, the project would not contribute to a significant cumulative impact associated with fire protection services.

**A-25 Significant Effect – Police Protection Services:** The FEIR identifies significant impacts related to the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

**Mitigation Measures:** Pub-1.1, Pub-1.2, and Pub-1.3, as well as other measures listed in Sections 2.1 through 2.17 of the EIR related to specific resources that may be adversely affected by construction of police service facilities.

**Facts in Support of Finding:** Build out of the proposed General Plan Update would result in a need for increased police services, including the potential need for new police facilities in order to maintain service standards set by the San Diego County Sheriff's Department (SDSD). As such, the construction or expansion of police facilities will be required, which would have the potential to result in substantial adverse impacts to the environment.

The project includes policies in the Land Use Element that address police protection facilities. The relevant policies are LU-1.4, LU-12.3, and LU-12.4. Adherence to these policies will minimize the deterioration of police response times and reduce impacts related to the construction or expansion of additional facilities needed to serve the projected population growth of the unincorporated County.

Mitigation measures identified in Chapters 2.1 through 2.17 of the EIR would also mitigate direct and cumulative impacts related to the construction or expansion of police protection facilities. Mitigation measures listed in these sections require that the development of new or expanded facilities be evaluated pursuant to the environmental resource(s) potentially affected. In addition, the following mitigation measures would also contribute to reducing impacts related to the construction or expansion of police protection facilities to below a level of significance:

- Pub-1.1 is the participation in interjurisdictional reviews to gather information on and review and provide comments on plans for new or expanded governmental facilities in the region. This will ensure that potential environmental impacts associated with new or expanded public services are identified and adequately mitigated.
- Pub-1.2 requires that the County plan and site governmental facilities that are context-specific according to their location in village, semi-rural, or rural lands. This will minimize potential environmental effects that result from incompatible uses (e.g., visual impacts, noise impacts, groundwater impacts, etc.).
- Pub-1.3 is the revision of Board Policy I-63 to minimize leapfrog development and to establish specific criteria for General Plan Amendments proposing expansion of areas designated Village regional category. This is intended to limit unexpected demands for new or expanded public services and the associated governmental facilities.

**Cumulative Impact – Police Protection Services:** Cumulative projects in the San Diego region would require increased police protection services to serve new development. The increase in demand for police protection services from

implementation of cumulative projects would have the potential to result in the need to construct or expand existing police facilities, which would have the potential to create an adverse impact on the environment. While the majority of cumulative projects would undergo environmental review, and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for police services, which would have the potential to result in a significant cumulative impact. Therefore, cumulative projects would result in a significant cumulative impact associated with the construction of police facilities. In addition, the General Plan Update would result in a potentially significant direct impact. However, implementation of the proposed General Plan Update policies and mitigation measures listed above and in Sections 2.1 through 2.17 of the EIR would reduce potentially significant direct and cumulative impacts to a level of less than significant. Therefore, the project would not contribute to a significant cumulative impact associated with police protection services.

- A-26 Significant Effect – Other Public Facilities:** The FEIR identifies significant impacts related to the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.

**Mitigation Measures:** Pub-1.1, Pub-1.2, and Pub-1.3, as well as other measures listed in Sections 2.1 through 2.17 of the EIR related to specific resources that may be adversely affected by construction of other public facilities.

**Facts in Support of Finding:** Build out of the proposed General Plan Update would result in an increase in the number of persons that must be provided with public library services. As such, the construction or expansion of other public facilities will be required in order to maintain adequate service levels established by the San Diego County Library (SDCL) system. This would have the potential to result in substantial adverse impacts to the environment.

The project includes policies in the Land Use Element that address the need for new or expanded library facilities. The relevant policies are LU-1.4, LU-9.4, LU-9.7, LU-12.3, LU-12.4, LU-18.1, and LU-18.2. Adherence to these policies would reduce environmental impacts associated with the need to construct additional library facilities.

Mitigation measures identified in Chapters 2.1 through 2.17 of the EIR would also mitigate direct and cumulative impacts related to the construction or expansion of library facilities. Mitigation measures listed in these sections require that the development of new or expanded facilities be evaluated pursuant to the environmental resource(s) potentially affected. In addition, the following mitigation measures would also contribute to reducing impacts related to the construction or expansion of library service facilities to below a level of significance:



- Pub-1.1 is the participation in interjurisdictional reviews to gather information on and review and provide comments on plans for new or expanded governmental facilities in the region. This will ensure that potential environmental impacts associated with new or expanded public services are identified and adequately mitigated.
- Pub-1.2 requires that the County plan and site governmental facilities that are context-specific according to their location in village, semi-rural, or rural lands. This will minimize potential environmental effects that result from incompatible uses (e.g., visual impacts, noise impacts, groundwater impacts, etc.).
- Pub-1.3 is the revision of Board Policy I-63 to minimize leapfrog development and to establish specific criteria for General Plan Amendments proposing expansion of areas designated Village regional category. This is intended to limit unexpected demands for new or expanded public services and the associated governmental facilities.

**Cumulative Impact – Other Public Services:** The San Diego County Library serves the entire unincorporated County and portions of surrounding incorporated cities. Cumulative projects that involve residential development would increase the population of library users, and result in the need to construct additional or renovate existing library facilities, which would result in a significant environmental impact. The increase in demand for library services from implementation of cumulative projects would result in the need to construct additional or expand existing library facilities, which would create an adverse impact on the environment. While the majority of cumulative projects would undergo environmental review, and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for library facilities, which would have the potential to result in a significant cumulative impact. Therefore, cumulative projects would result in a significant cumulative impact associated with the construction of library facilities. Implementation of the General Plan Update result in a potentially significant impact associated with the construction of new or expanded library facilities. However, proposed General Plan Update policies and mitigation measures listed above and in Sections 2.1 through 2.17 of the EIR would reduce potentially significant direct and cumulative impacts to a less than significant level. Therefore, the project would not contribute to a significant cumulative impact associated with library use and other public services.

## **RECREATION**

**A-27 Significant Effect – Deterioration of Parks and Recreational Facilities:** The FEIR identifies significant impacts related to increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.

**Mitigation Measures:** Rec-1.1 through Rec-1.12.

**Facts in Support of Finding:** The General Plan Update would result in an increase in the demand for recreational facilities, which has the potential to result in the deterioration of existing facilities. The current acreage of local park land would not meet projected goals; however, the existing supply of regional park area is expected to adequately meet the projected goals under the General Plan Update. If additional acreages of local park land are not provided in correlation with build-out of the project, then accelerated deterioration of existing recreational facilities may occur.

The project includes policies in the Land Use Element, Housing Element, Mobility Element, and Conservation and Open Space Element that address the deterioration of parks and recreational facilities. The relevant policies are LU-12.1, LU-12.2, M-12.1 through M-12.8, M-12.10, H-2.2, COS-21.1, COS-21.2, COS-22.1, COS-23.1, COS-23.2, COS-24.1, and COS-24.2. These policies require that infrastructure and services be provided concurrent with development, prohibit new development that degrades existing facilities, reduce recreational facility deterioration by requiring fees or the construction of new recreational facilities, encourage the acquisition of new recreational lands and the construction of additional trails, identify trail improvement strategies, encourage funding opportunities for recreational facilities, provide guidance for improving recreational facilities within the County, require certain projects to include on-site common open space, promote the diversity of recreational facilities, encourage the location of new parks into community center areas, promote acquisition of valuable open space resources, provide for additional public access and regional coordination so that additional recreational opportunities can be made to County residents, set recreation contributions for new development, and establish maximum funding opportunities. Adherence to these policies would minimize physical deterioration of parks or other recreational facilities.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Rec-1.1 is the implementation of Board Policy I-44 to identify park and recreation needs and priorities for communities, and utilize the Community Plans when identifying park and recreation facility requirements. This will help ensure that additional facilities are directed to areas with greatest need, thereby reducing overuse of existing parks and facilities.
- Rec-1.2 requires coordination with communities, agencies and organizations to identify, prioritize and develop park and recreation needs. This shall include pursuing partnership opportunities with school districts and other agencies to develop new park and recreation facilities; on-going support of the Park Advisory Committee and use of community center surveys to solicit input on park and recreation program and facility needs and issues; and continuing partnerships with other jurisdictions to share operation and maintenance costs for facilities via joint powers agreements.

- Rec-1.3 is a County design manual to provide concepts for park and recreation facility components. This will ensure that parks and recreation facilities are designed to be compatible with their surroundings and to meet community needs, thereby minimizing overuse of other facilities.
- Rec-1.4 requires that residential projects with 50 or more units identify park facility needs and meet Subdivision Ordinance requirements for provision of trail and pathways shown on the Regional Trails Plan or Community Trails Master Plan. In addition, this measure requires the County to develop standards and design guidelines for large residential projects to include common open space amenities, such as tot lots, and the use of universal design features that accommodate both able and disabled individuals. These steps will help ensure that recreational facility development is correlated with residential development.
- Rec-1.5 requires the County to obtain funding for land acquisition and construction of recreational facilities by taking the following actions: implement the PLDO; solicit grants and bonds to fund the operation and maintenance of park and recreation facilities; and form Landscape Improvement Districts and County Service Areas. The acquisition of land and construction of recreational facilities will further prevent potential deterioration of existing facilities.
- Rec-1.6 is the County acquisition of trail routes across private lands through direct purchase, easements, and dedication, or by other means from a willing property owner/seller. This measure will also encourage voluntary dedication of easements and/or gifts of land for trails through private-owned lands, including agricultural and grazing lands. Such acquisitions will allow provision of recreational facilities in unserved communities and reduce deterioration of existing facilities.
- Rec-1.7 prioritizes the acquisition and development of trail segments in a manner to provide maximum environmental and public benefit given available public and private resources and the population served. As part of this effort, the County shall also maintain a database of information on the locations, status of easements, classifications, forms of access, management activities and land ownership relative to trail facilities. These efforts will allow for expanded trail facilities concurrent with increased demand.
- Rec-1.8 is the implementation, and revision as necessary, of the Regional Trails Plan as well as the Community Trails Master Plan. This will ensure that community goals, policies, and implementation criteria are defined for community trails. This measure also requires interjurisdictional coordination for the implementation of these plans.
- Rec-1.9 requires that the County consult with the appropriate governing tribal council to facilitate the provision of trail connections through tribal land and/or Native

American cultural resources. This expansion of trail facilities would minimize deterioration of existing facilities.

- Rec-1.10 requires the County to develop procedures that would coordinate the operation and maintenance of pathways with similar activities for adjacent roads and road rights-of-way. This would prevent deterioration of pathways.
- Rec-1.11 prioritizes open space acquisition needs through coordination with government agencies and private organizations. Once prioritized, the acquisition of open space lands will be facilitated through negotiation with private land owners and through MSCP regulatory requirements. The operation and management of such acquisitions will continue to be achieved by preparing, implementing, and updating Resource Management Plans and MSCP Area Specific Management Directives (ASMDs) for each open space area. This will result in the coordinated acquisition and maintenance of new land which will offset potential physical deterioration of existing facilities.

**Cumulative Impact – Deterioration of Parks and Recreational Facilities:** The cumulative projects in the San Diego region would have the potential to result in a significant cumulative impact if they would, in combination, result in the deterioration of parks and recreational facilities due to increased usage. The majority of cumulative recreational projects would undergo environmental review, and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval. However, even cumulative projects that undergo environmental review would have the potential to result in significant and unavoidable impacts that could combine to form a significant cumulative impact from the removal or degradation of recreational facilities in the region. In addition, impacts that may be mitigated to a less than significant level on an individual project level would have the potential to result in a significant cumulative impact when combined with other project impacts. Therefore, a potentially significant cumulative impact would occur. Additionally, the General Plan Update would result in a cumulatively considerable contribution to a significant cumulative impact associated with deterioration of parks and recreational facilities. However, implementation of the General Plan Update policies and mitigation measures described above would mitigate the project's direct and cumulative impacts to below a level of significance.

**A-28 Significant Effect – Construction of New Recreational Facilities:** The FEIR identifies significant impacts related to the inclusion of recreational facilities or the construction or expansion of recreational facilities which would have an adverse effect on the environment.

**Mitigation Measures:** Rec-1.1, Rec-1.2, Rec-1.3, Rec-1.4, Rec-1.8, Rec-1.9, Rec-1.11, and Rec-2.1 through Rec-2.6

**Facts in Support of Finding:** The General Plan Update includes a number of recreational components. Although the project does not specifically site or plan recreational facilities, it would allow for the development of parks, trails, athletic fields, and golf courses. The construction of new recreational facilities would have the potential to result in physical environmental effects.

The project includes policies in the Land Use Element, Housing Element, Mobility Element, and Conservation and Open Space Element that address the construction or expansion of recreational facilities. The relevant policies are LU-6.4, LU-9.7, LU-18.2, M-12.5, M-12.9, M-12.10, H-2.2, COS-21.2, COS-21.3, COS-21.4, COS-23.1, and COS-23.3. These policies require residential subdivisions to reduce construction impacts to the environment, apply guidelines to maintain the unique character of a community, encourage the co-location of civic uses, guide the future development of trails in the unincorporated County to minimize environmental impacts and highlight existing natural resources, and require some projects to create common open space as a project amenity. Adherence to these policies would reduce the potential for construction and operation of new or expanded recreational facilities to have an adverse effect on the environment.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Rec-1.1 is the implementation of Board Policy I-44 to identify park and recreation needs and priorities for communities, and utilize the Community Plans when identifying park and recreation facility requirements. This will help ensure that additional facilities meet community needs.
- Rec-1.2 requires coordination with communities, agencies and organizations to identify, prioritize and develop park and recreation needs. This shall include pursuing partnership opportunities with school districts and other agencies to develop new park and recreation facilities; on-going support of the Park Advisory Committee and use of community center surveys to solicit input on park and recreation program and facility needs and issues; and continuing partnerships with other jurisdictions to share operation and maintenance costs for facilities via joint powers agreements.
- Rec-1.3 is a County design manual to provide concepts for park and recreation facility components. This will ensure that parks and recreation facilities are designed to be compatible with their surroundings and to meet community needs, thereby minimizing environmental impacts.
- Rec-1.4 requires that residential projects with 50 or more units identify park facility needs and meet Subdivision Ordinance requirements for provision of trail and pathways shown on the Regional Trails Plan or Community Trails Master Plan. In addition, this measure requires the County to develop standards and design

guidelines for large residential projects to include common open space amenities, such as tot lots, and the use of universal design features that accommodate both abled and disabled individuals. These steps will help ensure that impacts associated with recreational facilities are addressed early in project development.

- Rec-1.8 is the implementation, and revision as necessary, of the Regional Trails Plan as well as the Community Trails Master Plan. This will ensure that community goals, policies, and implementation criteria are defined for community trails. This measure also requires interjurisdictional coordination for the implementation of these plans.
- Rec-1.9 requires that the County consult with the appropriate governing tribal council to facilitate the provision of trail connections through tribal land and/or Native American cultural resources. This will help identify and avoid potential environmental impacts.
- Rec-2.1 requires the County to update Community Plans to reflect the character and vision for each individual community; to address civic needs in a community and encourage the co-location of uses; to establish and maintain greenbelts between communities; to prioritize infrastructure improvements and the provision of public facilities for villages and community cores; and to identify pedestrian routes. With these issues addressed in community plans, potential impacts to visual resources, community character, natural resources, cultural resources, and traffic will be substantially lessened should new or expanded recreational facilities be needed in a given community.
- Rec-2.2 requires the use of community design guidelines as a resource when designing park and recreation facilities. This will help ensure that such facilities are consistent with community character.
- Rec-2.3 is an amendment to the Subdivision Ordinance to require new residential development to be integrated with existing neighborhoods by providing connected and continuous road, environmentally-sensitive pathway/trail and recreation/open space networks. This amendment shall also include new conservation-oriented design guidelines for rural lands projects. This measure will assist in the planning for recreational facilities as new development is proposed while minimizing impacts to sensitive resources and community character.
- Rec-2.4 requires the County to develop procedures to consider designating trails that correspond to existing (non-designated) trails, paths, or unpaved roadbeds that already have a disturbed tread. This will minimize new impacts to the natural environment and will potentially benefit existing trail users.
- Rec-2.5 requires the County to monitor and manage preserves and trails through implementation of Resource Management Plans such that environmental resources

do not become impacted as a result of soil erosion, flooding, fire hazard, or other environmental or man-made effects. Any impacts identified to environmental resources must be restored in accordance with the management directives within the Resource Management Plans.

- Rec-2.6 requires the County to develop procedures that encourage the involvement and input of the agricultural community in matters relating to trails on or adjacent to agricultural lands and place a priority on the protection of agriculture. This will help minimize potential impacts to agricultural resources from expanded recreational facilities.

**Cumulative Impact – Construction of New Recreational Facilities:** The cumulative projects in the San Diego region would have the potential to result in a significant cumulative impact if they would, in combination, require the construction or expansion of recreational facilities which would have an adverse effect on the environment. While the majority of cumulative projects would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for new or expanded facilities, which would have the potential to result in adverse environmental effects. Therefore, cumulative projects would result in a significant cumulative impact associated with the construction of recreational facilities. Additionally, the project would result in a cumulatively considerable contribution to a significant cumulative impact associated with the construction or expansion of recreational facilities. However, implementation of the General Plan Update policies and mitigation measures described above would mitigate the project's direct and cumulative impacts to below a level of significance.

## ***TRANSPORTATION AND TRAFFIC***

**A-29 Significant Effect – Emergency Access:** The FEIR identifies significant impacts related to inadequate emergency access.

**Mitigation Measures:** Tra-1.3, Tra-1.4, Tra-1.6, and Tra-4.1 through Tra-4.4

**Facts in Support of Finding:** Under the proposed General Plan Update, existing inadequate roadway widths, dead end roads, one-way roads, and gated communities, all of which have the potential to impair emergency access, can still occur. Private roads also have the potential to impair emergency access as they are often unpaved and poorly maintained, which poses risks to public safety, especially in high wildfire hazard areas.

Therefore, inadequate emergency access impacts would be significant.

The project includes policies in the Land Use Element, Mobility Element, and Safety Element which would reduce the potential for inadequate emergency access. The relevant policies are: LU-2.8, LU-6.10, LU-12.2, M-1.2, M-3.3, M-4.4, S-3.4, S-3.5, and

S-14.1. These policies require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards, require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses, provide for transportation facilities that can be adequately served by emergency services in the case of a transportation hazard, require that development provide multiple ingress/egress routes whenever feasible, require public and private roads to allow fire apparatus and emergency vehicle access while accommodating outgoing vehicles from evacuating residents, require development to be located near available fire and emergency service, and require development provide secondary access when necessary to ensure adequate fire safety. Adherence to these policies will reduce potential impacts associated with inadequate emergency access.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Tra-1.3 requires application of the County Public Road Standards during review of new development projects. In addition, the Public Road Standards shall be revised to include a range of road types according to Regional Category context. This will improve circulation and reduce the need for additional emergency access roads.
- Tra-1.4 requires the County to implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This applies to the issue of emergency access as well as other transportation issues. Implementation of these thresholds will ensure that new development will mitigate or avoid impacts and can have the effect of improving existing conditions.
- Tra-1.6 is the preparation of project review procedures to require large commercial and office development to use Transportation Demand Management Programs to reduce single-occupant vehicle traffic generation and to prepare and forward annual reports to the County on the effectiveness of the program. This will maximize the capacity of road facilities and allow for improved responsiveness of emergency vehicles.
- Tra-4.1 requires the County to update Community Plans to identify local public road and community emergency evacuation route networks and pedestrian routes as appropriate. This will help identify and address areas that have inadequate emergency access.
- Tra-4.2 is the implementation of Building and Fire Codes to ensure there are adequate service levels in place associated with the construction of structures and their accessibility and egress.



- Tra-4.3 requires the County to implement and revise as necessary the County Guidelines for Determining Significance for Wildland Fire and Fire Protection to evaluate adverse environmental effects of projects. Fire protection plans shall also be required to ensure the County Fire Code and other applicable regulations are being met.
- Tra-4.4 requires the County to implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards. This would ensure that new subdivision projects have adequate emergency access.

**Cumulative Impact – Emergency Access:** The area of analysis for cumulative emergency access impacts includes the County of San Diego and surrounding jurisdictions. Cumulative projects in this area would encounter similar emergency access impairment issues as the General Plan Update. Existing conditions in these jurisdictions include inadequate roadway widths, dead end roads, one-way roads, and gated communities, have the potential to impair emergency access.. However, cumulative emergency access impacts would be limited to the immediate vicinity of the impact, such as multiple obstructions to emergency access along the same route to an emergency care facility hospital. In addition, most cumulative projects which propose the construction of new roadways, would be required to meet current State and applicable jurisdictional standards, in addition to CEQA requirements. Community plans would also be required to consider local public and fire access roads to fully address emergency access requirements. The exception to this would be projects in Baja California, Mexico and projects on tribal land; however it would be unlikely for cumulative projects on tribal lands or within Mexico to occur simultaneously and in close enough proximity to one another to create a potentially significant cumulative emergency access impact on roadways in the County. Therefore, cumulative project impacts would be considered less than significant because emergency access impacts would be limited to the immediate vicinity of a project area and associated impacts would be considered direct, not cumulative. The project would not contribute to a significant cumulative impact associated with emergency access.

**A-30 Significant Effect – Parking Capacity:** The FEIR identifies significant impacts related to inadequate parking capacity.

**Mitigation Measures:** Tra-1.4, Tra-1.6, Tra-5.1, and Tra-5.2

**Facts in Support of Finding:** Almost all land uses proposed under the General Plan Update would require parking facilities when developed. Future development would be required to adhere to standards that require sufficient off-street parking. However, the land uses proposed under the General Plan Update would have the potential to require modification to existing County parking regulations.

The project includes policies in the Mobility Element which would reduce the potential for inadequate parking capacity. The relevant policies are: M-8.6, M-9.3, M-9.4, and M-10.1 through M-10.4. These policies improve regional opportunities for park-and-ride facilities, encourage preferred parking, require park-and-ride facilities in certain land uses and development, set standards for parking capacity and design, provide for sufficient parking capacity for motor vehicles consistent with development and use type, and require development to maximize on-street parking and minimize parking where it is not needed. Adherence to these policies will reduce the potential for inadequate parking capacity.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- Tra-1.4 requires the County to implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This applies to the issue of parking capacity as well as other transportation issues.
- Tra-5.1 requires the County to review and revise parking regulations in the Zoning Ordinance for senior housing and affordable housing, utilizing data from studies conducted for these groups. By using research that identifies the specific transportation and parking needs for these housing types, the County can maximize parking capacity where it is in highest demand and minimize parking where it is not needed.
- Tra-5.2 is the preparation of town center plans for village areas that incorporate shared parking facilities and include in Community Plans or other appropriate documents. This will further ensure that there is sufficient parking capacity in areas of high density.
- Tra-5.3 is the revision of the Public Road Standards to include standards for the provision of parallel and diagonal on-street parking, according to Regional Category. This measure will ensure that additional parking capacity is provided on public roads with increased traffic.

**Cumulative Impact – Parking Capacity:** The area of analysis for cumulative parking capacity includes the County of San Diego and the immediate vicinity of land uses requiring parking, including those located in surrounding jurisdictions. Cumulative projects in this area would face similar parking capacity issues as the project. Many jurisdictions surrounding the unincorporated County are densely populated, especially in the western portion of the unincorporated County. Therefore, the potential exists that existing and proposed high density land uses, designated under surrounding jurisdictions general plans, would not be able to supply adequate parking facilities, due

to area constraints. However, cumulative parking impacts would be limited to the immediate vicinity of the impact, such as a specific urban development project. In addition, most future cumulative projects would be required to comply with existing regulations pertaining to parking facilities, such as jurisdictional parking, zoning and road standards. The exception to this would be projects in Baja California, Mexico, and projects on tribal land; however it would be unlikely for cumulative projects on tribal lands or within Mexico to occur simultaneously and in close enough proximity to one another to create a potentially significant cumulative parking impact on County facilities. Therefore, cumulative projects would not result in a significant cumulative impact because impacts associated with parking would be limited to the immediate vicinity of a project area and associated impacts would be considered direct, not cumulative. The project would not contribute to a significant cumulative impact associated with parking capacity.

**A-31 Significant Effect – Alternative Transportation:** The FEIR identifies significant impacts related to conflicts with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

**Mitigation Measures:** Tra-5.1, Tra-5.2, and Tra-6.1 through Tra-6.9

**Facts in Support of Finding:** Existing adopted policies, plans and programs which support alternative transportation within the County were based on the existing County of San Diego General Plan, rather than the proposed General Plan Update. Therefore, it is possible these policies and programs do not account for proposed high density land uses such as village residential and village core mixed use. Additionally, the reallocation of population and concentration of high density land uses into the western portion of the unincorporated County, as proposed under the General Plan Update, would have the potential to require modification to existing public transportation policies, plans, and programs.

The project contains goals and policies in the Land Use Element and Mobility Element that address alternative transportation. The relevant policies are: LU-5.1, LU-5.4, LU-5.5, LU-9.8, LU-11.6, M-3.1, M-3.2, M-4.3, M-8.1, M-8.2, M-8.3, M-8.4, M-8.5, M-8.6, M-8.7, M-8.8, M-9.2, M-9.4, and M-11.1 through M-11.7. The policies in the Land Use Element reduce vehicle trips within communities, promote infill and redevelopment, prohibit projects that impede bicycle or walking access, require development within villages to include pedestrian routes, and direct new office development to be located in areas where public transit and vehicular linkages exist. Within the Mobility Element, these policies require development projects to contribute their fair share toward financing transportation facilities, encourage development that accommodates alternative transportation, require incorporation of alternative modes of transportation in new development, encourage rural roads that safely accommodate multiple types of transportation, promote transit service for transit-dependent populations, provide for transit service to key community facilities and services, provide for transit stops that

facilitate ridership, require transit stops to provide amenities, require and improve transit and park-and-ride facilities, improve inter-regional travel modes, require coordination with large employers to provide shuttles and other means of transportation, facilitate transportation demand management, provide for new and expanded pedestrian and bicycle networks, and improve funding and coordination for bicycle and pedestrian facilities. Adherence to these policies will minimize potential conflicts with programs supporting alternative transportation.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts as follows:

- Tra-5.1 requires the County to review and revise parking regulations in the Zoning Ordinance for senior housing and affordable housing, utilizing data from studies conducted for these groups. By using research that identifies the specific transportation and parking needs for these housing types and updating the Zoning Ordinance accordingly, the County can maximize opportunities for alternative transportation facilities and ensure consistency with adopted policies, plans, and programs that address alternative transportation.
- Tra-5.2 is the preparation of town center plans for village areas that incorporate shared parking facilities and include in Community Plans or other appropriate documents. This will help identify alternative transportation needs in high density areas.
- Tra-6.1 requires the County to establish policies and design guidelines within community plans that encourage commercial centers in compact walkable configurations and discourage “strip” commercial development. These types of design standards can reduce vehicle trips and promote access to services via alternative modes of transportation such as walking or bicycling.
- Tra-6.2 requires the County to establish comprehensive planning principles for transit nodes such as the SPRINTER Station located in North County Metro. This measure will allow for greater consistency between the County General Plan and plans addressing alternative transportation such as mass transit.
- Tra-6.3 requires the County to locate County facilities near transit facilities, whenever feasible. Implementation of this measure will facilitate use of alternative transportation among County employees as well as among people needing County services.
- Tra-6.4 is the coordination with SANDAG, Caltrans, and tribal governments to maximize opportunities to locate park and ride facilities. This will enhance alternative transportation opportunities for County residents in areas where it would substantially reduce vehicle miles traveled.

- Tra-6.5 is the coordination with SANDAG, Caltrans, and transit agencies to expand the mass transit opportunities in the unincorporated county and to review the location and design of transit stops. This measure also requires the County to establish a Department of Planning and Land Use transit coordinator to ensure land use issues are being addressed. This coordination will further ensure consistency between County land use decisions and adopted policies, plans and programs that support alternative transportation.
- Tra-6.6 requires the County to review the improvement plans for railroad facilities in the unincorporated County. This will further correlate rail planning with land use planning.
- Tra-6.7 requires the County to implement and revise the County Bicycle Transportation Plan every five years, or as necessary, to identify a long range County bicycle network and qualify for State or other funding sources. This also includes coordination with the County Trails Program. By regularly updating the Bicycle Transportation Plan, the County will be able promote alternative transportation while ensuring that conflicts do not occur between adopted land use plans and transportation plans/programs.
- Tra-6.8 is the coordination with SANDAG in the development of a Regional Bicycle Plan to ensure consistency with County transportation plans. This also includes coordination with the County Trails Program. This coordination will prevent potential conflicts between land use plans and the Regional Bicycle Plan, as well as ensuring consistency with the County Trails Program which supports multiple types of alternative transportation.
- Tra-6.9 requires the County to implement and revise as necessary the County Trails Program (CTP) for trail development and management. In addition, the County must implement and revise as necessary the Community Trails Master Plan (CTMP), which incorporates adopted individual community trail and pathway plans, based on community goals, policies, and implementation criteria. This will ensure that the County continues to support and expand upon alternative transportation opportunities through the CTP and CTMP consistent with implementation of the General Plan Update.

**Cumulative Impact – Alternative Transportation:** The area of analysis for cumulative alternative transportation impacts includes the County of San Diego and immediately surrounding jurisdictions. Cumulative projects in these areas include projects consistent with surrounding jurisdictions' general plans and regional roadway plans. Similar to the General Plan Update, cumulative projects would potentially impair existing alternative transportation plans, policies, or programs. Additionally, if cumulative projects in surrounding jurisdictions are not effectively communicated and planned with agencies managing alternative transportation in region, conflicts would occur. However, most

cumulative projects would be required to comply with existing federal, State, and local regulations, and any applicable Community plans or jurisdictional standards, such as a zoning ordinance. Therefore, the project would not contribute to a significant cumulative impact associated with alternative transportation.

## **UTILITIES AND SERVICE SYSTEMS**

**A-32 Significant Effect – Wastewater Treatment Requirements:** The FEIR identifies significant impacts related to exceedance of wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB).

**Mitigation Measures:** USS-1.1 through USS-1.3

**Facts in Support of Finding:** The demand for wastewater treatment capacity would potentially increase upon implementation of the proposed General Plan Update. An increase in wastewater demand would require the need for new or expanded facilities to be constructed. In order to be permitted, new facilities would be required to meet the wastewater treatment requirements for the RWQCB. Yet, if the demand increased at a rate disproportionate to capabilities of wastewater treatment facilities, a violation in wastewater treatment standards could occur.

The project includes policies in the Land Use Element that address wastewater treatment requirements. The relevant policies are LU-9.4, LU-12.1, LU-12.2, and LU-14.1 through LU-14.4. These policies prioritize infrastructure improvements and provision of public facilities in community cores and require concurrency of infrastructure and services with development as well as maintenance of adequate services with development. These policies also require adequate wastewater facility plans, disposal, treatment facilities, and sewer facilities. Adherence to these policies will reduce impacts associated with exceedance of RWQCB wastewater treatment requirements.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- USS-1.1 requires interjurisdictional reviews to gather information on and review and provide comments on plans of incorporated jurisdictions and public agencies in the region. This will help ensure that wastewater treatment needs are identified and planned to be proportionate to the provision of adequate facilities.
- USS-1.2 requires the County to implement and revise as necessary Board Policy I-84 to ensure adequate availability of sewer /sanitation service for development projects that require it. This measure also includes revision to Board Policy I-78 to include additional criteria and regulatory requirements restricting the location of small wastewater treatment facilities. This will help ensure that demand for wastewater treatment does not exceed capacity.

- USS-1.3 requires County planning staff participation in the review of wastewater facility long range and capital improvement plans. This measure will ensure that the County is meeting RWQCB requirements and that infrastructure is being planned concurrent with development.

**Cumulative Impact – Wastewater Treatment Requirements:** Cumulative projects within the region, such as those proposed under adjacent city and county general plans or on tribal land, would result in an increase in residential, commercial and industrial development that would require wastewater treatment services. Similar to the General Plan Update, an increase in wastewater treatment demand that is disproportionate to wastewater treatment capabilities would result in a violation of the treatment requirements. However, compliance with regulations and CEQA would reduce cumulative impacts related to potential wastewater treatment violations to below a significant level and a significant cumulative impact would not occur. Therefore, implementation of the General Plan Update, in combination with the identified cumulative projects, would not result in a significant cumulative impact.

**A-33 Significant Effect – New Water or Wastewater Treatment Facilities:** The FEIR identifies significant impacts associated with new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

**Mitigation Measures:** USS-2.1 through USS-2.3

**Facts in Support of Finding:** Build-out of the General Plan Update would result in the construction of residential, commercial and industrial structures, which would result in an increased need for water and wastewater treatment services. In order to meet the increased demand, new and expanded water and wastewater treatment facilities would need to be constructed. The construction of new or expanded water and/or wastewater facilities would have the potential to cause secondary environmental effects to air quality, cultural resources, noise, hydrology or other environmental issues.

The project includes policies in the Land Use Element and Housing Element that address water and wastewater treatment facilities. The relevant policies are LU-1.2, LU-4.3, and H-1.3. These policies prohibit leapfrog development that would require the construction of new infrastructure facilities, require consideration of the relationship of plans in adjoining jurisdictions, and encourage housing near public infrastructure which would reduce the need for new infrastructure that could have significant effects on the environment. Adherence to these policies will reduce impacts associated with new or expanded water and/or wastewater treatment facilities.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- USS-2.1 requires the County to revise Board Policy I-63 to minimize leapfrog development and to establish specific criteria for GPAs proposing expansion of areas designated village regional category. This is intended to limit unexpected demands for new water and wastewater facilities.
- USS-2.2 requires the County to conduct CEQA review on privately initiated water and wastewater facilities and review and comment on water and wastewater projects undertaken by other public agencies to ensure that impacts are minimized and that projects are in conformance with County plans. This will ensure that environmental effects associated with new or expanded facilities are adequately analyzed and mitigated.
- USS-2.3 requires the County to implement, and revise as necessary, the Green Building Program to encourage project designs that incorporate water conservation measures, thereby reducing the potential demand for new water purveyors with the buildout of General Plan Update. This will, in turn, minimize future environmental impacts that would result from new or expanded facilities.

**Cumulative Impact – New Water and Wastewater Treatment Facilities:** Cumulative projects would result in an increase in residential, commercial and industrial development that would increase the demand for water and wastewater treatment services. An increase in the demand for these services has the potential to require or result in the construction of new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. Most future water treatment or wastewater treatment projects would be required to conduct environmental review pursuant to CEQA or NEPA. To the extent feasible, significant environmental impacts would be mitigated to below a level of significant, consistent with CEQA or NEPA. In addition, most cumulative projects would be required to comply with existing standards and regulations, which would also reduce the potential for significant impacts to occur. As such, cumulative impacts associated with the development of water and wastewater facilities from cumulative projects would not be significant. Therefore, implementation of the General Plan Update, in combination with the identified cumulative projects, would not result in a significant cumulative impact.

**A-34 Significant Effect – Sufficient Stormwater Drainage Facilities:** The FEIR identifies significant impacts related to new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

**Mitigation Measures:** USS-3.1 through USS-3.5

**Facts in Support of Finding:** Build-out of the General Plan Update would result in an increase in impervious surfaces, which would result in increased stormwater runoff. Such an increase would likely exceed the capacity of existing stormwater drainage



systems, requiring the construction of new or expanded facilities. The construction of new or expanded stormwater drainage facilities would have the potential to cause secondary environmental effects to agriculture, biology, cultural resources, noise, or other environmental issues.

The project includes policies in the Land Use Element and the Conservation and Open Space Element that address stormwater drainage facilities. The relevant policies are LU-6.5, LU-6.9, and COS-4.3. These policies require sustainable stormwater management and development conformance with topography and require that stormwater filtration development utilize natural drainage patterns in order to reduce environmental impacts from the alteration of existing drainage patterns or construction of new drainage facilities. Adherence to these policies will reduce impacts associated with new or expanded stormwater drainage facilities.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- USS-3.1 would result in an amendment of the Subdivision Ordinance to include additional design requirements for subdivisions that encourage conservation oriented design. The amendment would also include regulations that require new residential development to be integrated with existing neighborhoods by providing connected and continuous road, pathway/trail and recreation/open space networks. This will reduce scattered development footprints and increase pervious surfaces in site design, thereby minimizing the need for new stormwater drainage facilities.
- USS-3.2 is the preparation of Subdivision Design Guidelines that establish a process to identify significant resources on a project site, identify the best areas or development and create a conservation oriented design for both the project and open space areas. This will minimize the need for new or expanded stormwater facilities and will minimize impacts if such facilities are included in a project.
- USS-3.3 requires use of the County Guidelines for Determining Significance for Surface Water Quality and Hydrology to identify adverse environmental effects on water quality. These guidelines provide measures for reducing stormwater runoff.
- USS-3.4 requires the County to implement the LID handbook and establish LID standards for new development to minimize runoff and maximize infiltration.
- USS-3.5 requires the County to evaluate the environmental effects of all proposed stormwater drainage facilities and ensure that significant adverse effects are minimized and mitigated.

**Cumulative Impact – Sufficient Stormwater Drainage Facilities:** Cumulative projects would result in an increase in impervious surfaces from development which would

increase stormwater runoff volumes. To effectively manage the increased runoff, the construction of new stormwater drainage facilities or the expansion of existing facilities would be required, the construction of which would have the potential to result in significant environmental effects. Most future stormwater drainage facilities would be required to conduct environmental review pursuant to CEQA or NEPA. To the extent feasible, significant environmental impacts would be mitigated to below a level of significant. In addition, cumulative projects would typically be required to comply with existing standards and regulations. As such, impacts associated with the construction of new stormwater drainage facilities from cumulative projects would not be significant. Therefore, the General Plan Update, in combination with the identified cumulative projects, would not result in a significant cumulative impact.

**A-35 Significant Effect – Adequate Wastewater Facilities:** The FEIR identifies significant impacts associated with the determination by the wastewater provider which serves or may serve the project area that it has inadequate capacity to service the project's projected demand in addition to the provider's existing commitments.

**Mitigation Measures:** USS-1.1 through USS-1.3

**Facts in Support of Finding:** Under the General Plan Update, some wastewater service providers would require upgrades or have inadequate capacity to serve projected growth within the County.

The project includes a policy in the Land Use Element which would reduce the potential for development with inadequate wastewater capacity. The relevant policy is: LU-4.3 Relationship of Plans in Adjoining Jurisdictions. This policy requires the County to consider the plans and projects of overlapping or neighboring agencies in the planning of unincorporated lands, and to invite comments and coordination when appropriate. Adherence to this policy will reduce impacts associated with wastewater facilities.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- USS-1.1 requires interjurisdictional reviews to gather information on and review and provide comments on plans of incorporated jurisdictions and public agencies in the region. This will help ensure that wastewater treatment needs are identified and planned to be proportionate to the provision of adequate facilities.
- USS-1.2 requires the County to implement and revise as necessary Board Policy I-84 to ensure adequate availability of sewer /sanitation service for development projects that require it. This measure also includes revision to Board Policy I-78 to include additional criteria and regulatory requirements restricting the location of small wastewater treatment facilities. This will help ensure that demand for wastewater treatment does not exceed capacity.

- USS-1.3 requires County planning staff participation in the review of wastewater facility long range and capital improvement plans. This measure will ensure that the County is meeting RWQCB requirements and that infrastructure is being planned concurrent with development.

**Cumulative Impact – Adequate Wastewater Facilities:** Cumulative projects would have the potential to increase demand for wastewater facilities to the point that the wastewater provider has inadequate capacity to serve the projected demand, in addition to the provider's existing commitments. Therefore, cumulative projects would require new facilities, the construction of which could have significant environmental impacts. However, most development of new facilities would be subject to CEQA or NEPA review and would be required to mitigate environmental impacts to below a level of significance, to the extent feasible. Additionally, multiple federal, State and local regulations exist that pertain to the construction and operation of wastewater facilities. Therefore, a significant cumulative impact would not occur. The General Plan Update, in combination with the identified cumulative projects, would not contribute to a significant cumulative impact.

- A-36 Significant Effect – Energy:** The FEIR identifies significant impacts related to the construction of new energy production and/or transmission facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.

**Mitigation Measures:** USS-8.1 through USS-8.4

**Facts in Support of Finding:** Build-out of the General Plan Update would require energy facilities to be constructed or expanded, which would have the potential to result in significant environmental effects.

The project includes policies in the Conservation and Open Space Element that address energy use and energy facilities. The relevant policies are COS-14.7, and COS-15.1 through COS-15.5. These policies encourage alternative energy sources, energy efficiency, green building programs, and energy recovery for development. Adherence to these policies will reduce impacts associated with new or expanded energy facilities.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- USS-8.1 requires the County to implement, and revise as necessary, the County Green Building Program through incentives for development that is energy efficient and conserves resources. This will reduce the need for new or expanded energy facilities.
- USS-8.2 is the revision of Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County

funded renovation and new building projects. This also includes revision of Board Policy G-15 to require County facilities to comply with Leadership in Energy and Environmental Design (LEED) standards or other Green Building rating systems. This will reduce energy usage for government operations and further minimize the need for additional energy facilities.

- USS-8.3 is the revision of Board Policy G-16 to require the County to adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability. The revision to the policy would also require government contractors to use low emission construction vehicles and equipment. This will reduce energy usage for government operations and further minimize the need for additional energy facilities.
- USS-8.4 is the preparation of a County Climate Change Action Plan with a baseline inventory of greenhouse gas emissions from all sources; greenhouse gas emissions reduction targets and deadlines, and enforceable greenhouse gas emissions reduction measures. This Plan will help the County and the community to minimize energy usage.

**Cumulative Impact – Energy:** Multiple cumulative projects relating to energy are considered in the analysis: the California Energy Commission has identified energy projects within the region that will be constructed to meet future energy demands; the Wide-west Energy Corridor project would establish electric and multi-modal transmission corridors within Bureau of Land Management and National Forest Service lands in San Diego and surrounding counties; the Sunrise Powerlink Transmission Project would be constructed to meet the energy demands of the region; and both SDG&E and Southern California Edison have procurement plans that identify energy projects to be constructed in the future. Cumulative projects would result in the construction of new energy production facilities, transmission facilities, or expansion of existing facilities. Any future energy project would be required to conduct environmental review pursuant to CEQA or NEPA prior to approval. Identified significant environmental impacts would be mitigated to below a level of significance, to the extent feasible. However, due to the large scale nature of these projects, it is reasonably foreseeable that the construction of these facilities would cause significant and unavoidable environmental impacts, such as those associated with air quality, aesthetics, noise, or climate change, that in combination with other cumulative projects would result in a significant cumulative impact. Additionally, the General Plan Update would result in a cumulatively considerable contribution to significant cumulative impact. However, implementation of the proposed General Plan Update policies and mitigation measures, in addition to the California Energy Efficiency Standards for residential and non-residential buildings, would reduce direct and cumulative impacts related to the need for the expansion or construction of energy facilities to a level below significance.

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**GLOBAL CLIMATE CHANGE**

**A-37 Significant Effect – Compliance with AB 32:** The FEIR identifies significant impacts related to greenhouse gas emissions and the ability to meet the goals and strategies of AB 32.

**Mitigation Measures:** CC-1.1 through CC-1.19

**Facts in Support of Finding (see also Attachment A: Supplemental CEQA Findings Pertaining to Climate Change):** By the year 2020, greenhouse gas (GHG) emissions are projected to increase to 7.1 million metric tons of CO<sub>2</sub> (MMTCO<sub>2</sub>E) equivalent (from 5.3 MMTCO<sub>2</sub>E 1990) without incorporation of State Mandated Programs/regulations and any Countywide GHG-reducing policies or mitigation measures. This amount represents an increase of 24 percent (1.37 MMTCO<sub>2</sub>E) over 2006 levels, and a 36 percent (1.87 MMTCO<sub>2</sub>E) increase from estimated 1990 levels.

Several significant federal and state programs are expected to reduce emissions. Much of the following information comes from the University of San Diego (USD) Energy Policy Initiatives Center (EPIC) 2008 San Diego County Greenhouse Gas Inventory. Due to the relevance of this document, it is hereby incorporated by reference and can be obtained from USD EPIC or at <http://www.sandiego.edu/epic/ghginventory/>.

AB 1493, or the Pavley Bill, is a standard for new light-duty passenger vehicles that could reduce San Diego County emissions from these vehicles by 21% by 2020. The law requires auto manufacturers to reduce vehicle emissions of carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), and hydrofluorocarbons (HFCs) in light-duty vehicles. AB 1493 defines light duty passenger vehicles as including passenger cars, light-duty trucks, and medium-duty trucks/vehicles. Under the law, manufacturers would need to reduce greenhouse gases from tailpipe emissions and fugitive emissions from air-conditioning systems.

If implemented, the Pavley bill regulations would begin with the 2009 model year and end in 2016, when an 11% reduction in emissions is required. The period from 2009 to 2016 is known as “Pavley 1”; the period from 2017 to 2020 is “Pavley 2” and would require an additional 9% GHG reduction by 2020. Pavley 2 is a commitment made by the California Air Resources Board to extend progress from Pavley 1 and to increase the greenhouse gas reduction requirement to 20%.

The federal Corporate Average Fuel Economy (CAFE) standard determines the fuel efficiency of certain vehicle classes in the United States. The current standard has remained largely unchanged since 1990. In 2007, as part of the Energy and Security Act of 2007, CAFE standards were increased for new light-duty vehicles to 35 miles per gallon by 2020. The new CAFE standards will take effect no sooner than 2011. Unlike the Pavley Bill, which has a specific GHG emissions reduction target, the CAFE

standards simply prescribe fuel economy, which will also result in greenhouse gas reductions.

In a study comparing Pavley 1 and 2 with the federal CAFE standard, CARB reported that the CAFÉ standard would reduce GHG emissions by 5% by 2016 and 12% by 2020; the Pavley 1 and 2 standards are expected to reduce emissions by 20 % by 2020. The CAFE standard requires reductions from light- and heavy-duty vehicles, whereas Pavley 1 and 2 only require reductions from light-duty vehicles. A reduction requirement for heavy-duty vehicles has not yet been determined for CAFE; therefore, for purposes of EPIC's estimates, the emissions reduction requirement for heavy-duty vehicles can be taken to be the same as the Federal standard for light-duty vehicles on a percentage basis, which is 5% by 2016 and 12% by 2020. Even though the effects of the Pavley Bill are greater than the effects of the new CAFE standards for light-duty vehicles, EPIC chose to calculate separate values for each.

The Low Carbon Fuel Standard (LCFS) was included in a California Governor's Executive Order that was promulgated in January 2007. This strategy addresses the type of fuel used in vehicles. Efficiency standards affect the total amount of fuel used, whereas the low-carbon fuel standard seeks to reduce the carbon content of the fuel, therefore reducing GHG emissions even if total fuel consumption is not reduced. The Low-Carbon Fuel Standard has been approved by CARB as a discrete early action item under AB 32 and implementing regulations are currently under development. A reasonable assumption of the effects of the Low-Carbon Fuel Standard would be a 10% reduction in GHG emissions from fuel use by 2020.

California's Renewable Portfolio Standard (RPS) (initially implemented by SB 1082) requires the state's three investor-owned utilities to provide at least 20% of energy supplies from renewable sources by 2010 and 33% by 2020. According to the California Public Utilities Commission, California's three major utilities supplied, on average, 13% of their 2006 retail electricity sales with renewable power. SDG&E currently supplies about 6% of its sales with renewable energy. To calculate the potential emissions reduction to meet the 20% RPS, one can assume the current level of 6% and that SDG&E attains its 20% goal by 2010 – a 14% percentage point increase. Achieving the 20% standard would represent about 37% of all the emissions reductions from the electricity sector.

These regulations and other policies and programs were assumed in calculating likely reductions in emission for the County. More detail is contained in Appendix K of the EIR and Attachment A to these findings. In summary, the following reductions were calculated:

**County Operation Estimated GHG Emissions Reductions (metric tons of CO<sub>2</sub>e)**

<b>Category</b>	<b>2020 Business -as- Usual</b>	<b>Reductions</b>	<b>2020 with Reductions</b>	<b>1990 Estimates</b>
Buildings	71,022	-29,199	41,823	48,399
Vehicle Fleet	29,696	-7,424	22,272	22,071
Employee Commute	70,201	-15,444	54,757	63,255
Water	2,939	-1,000	1,939	1,799
Waste	1,751	-500	1,251	1,680
<b>Total</b>	<b>175,609</b>	<b>-53,567</b>	<b>122,042</b>	<b>137,204</b>

**Community Projected GHG Emissions Reductions for Unincorporated County**

<b>Category</b>	<b>2020 Business -as-Usual</b>	<b>Reductions</b>	<b>2020 with Reductions</b>	<b>1990 Estimates</b>
Electricity (includes water usage)	1,897,370	-702,026	1,195,344	1,035,005
Natural Gas	620,957	-49,676	571,281	477,695
On-Road Vehicles	3,471,505	-902,591	2,568,914	2,740,000
Off-Road Vehicles & Equipment	275,981	-103,493	172,488	175,889
Waste	155,239	-51,229	104,010	143,308
Other Fuels	224,235	-56,059	168,176	222,924
Wildfire	300,000	--	300,000	200,000
Agriculture (Livestock)	30,000	--	30,000	145,000
<b>Total</b>	<b>6,975,287</b>	<b>-1,865,074</b>	<b>5,110,213</b>	<b>5,139,821</b>

While there are already a significant number of federal, state, and local regulations, policies, and programs to reduce GHG emissions, the project includes policies in the Conservation and Open Space Element that further address greenhouse gas emissions. The relevant policies are COS-10.7, COS-15.1, COS-15.2, COS-15.3, COS-17.1, COS-17.5, COS-18.2, COS-20.1, COS-20.2, and COS-20.4. Policy COS-10.7 encourages the installation and operation of construction and demolition (C&D) debris recycling facilities as an accessory use permitted (or otherwise authorized) mining facilities to increase the supply of available mineral resources. Policy COS-15.1 requires that new buildings be designed and constructed to incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and

reduce emissions of GHGs and toxic air contaminants. Policy COS-15.2 encourages retrofit of existing buildings to incorporate architectural features, heating and cooling, water, energy, and other design elements that improve their environmental sustainability and reduce GHG emissions. Policy COS-15.3 requires all new County facilities, as well as renovation and expansion of existing County buildings, to meet identified “green building” programs that demonstrate energy efficiency, energy conservation, and renewable technologies. Policy COS-17.1 promotes sustainable solid waste management by requiring reduction, reuse, or recycling of all types of solid waste that is generated. Policy COS-17.5 promotes efficient methods for methane recapture in landfills and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as electricity. Policy COS-18.2 encourages use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites. Policy COS-20.1 requires preparation, maintenance, and implementation of a climate change action plan with a baseline inventory of GHG emissions from all sources, GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures. Policy COS-20.2 is the preparation and implementation of a program to monitor GHG emissions attributable to development, transportation, infrastructure, and municipal operations and periodically review the effectiveness of and revise existing programs as necessary to achieve GHG emission reduction objectives. Policy COS-20.4 promotes public education by requiring the County to furnish materials and programs that educate and provide technical assistance to the public, development professionals, schools, and other parties regarding the importance and methods for sustainable development and the reduction of GHG emissions. Adherence to these policies will reduce impacts associated with greenhouse gas emissions.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- CC-1.1 is the update of the County Green Building Program to increase the effectiveness of development incentives for resource conservation and energy efficiency through education. Under this program, development will result in less greenhouse gas emissions, which will help the County achieve AB 32 goals.
- CC-1.2 requires the preparation of a County Climate Change Action Plan within six months from the adoption date of the General Plan Update. The Climate Change Action Plan will include a baseline inventory of greenhouse gas emissions from all sources and more detailed greenhouse gas emissions reduction targets and deadlines. The County Climate Change Action Plan will achieve comprehensive and enforceable GHG emissions reduction of 17% (totaling 23,572 MTCO<sub>2</sub>E) from County operations from 2006 by 2020 and 9% reduction (totaling 479,717 MTCO<sub>2</sub>E) in community emissions from 2006 by 2020. Implementation of this Climate Change



Action Plan will contribute to meeting the AB 32 goals, in addition to the State regulatory requirements noted above.

- CC-1.3 requires that the County work with SANDAG to achieve regional goals in reducing GHG emissions associated with land use and transportation. Although the County has no jurisdiction over vehicle emissions, certain land use decisions can contribute to a reduction in vehicle miles traveled (VMT). By working with SANDAG as it incorporates sustainable communities strategies in its 2050 Regional Transportation Plan, measurable GHG reductions will be achieved consistent with AB 32 strategies.
- CC-1.4 is the review of traffic operations to implement measures that improve flow and reduce idling such as improving traffic signal synchronization and decreasing stop rate and time. Vehicle idling leads to unnecessary fuel consumption and GHG emissions. Idling reduction can substantially reduce GHG emissions generated by vehicles on County roads.
- CC-1.5 is the coordination with the San Diego County Water Authority and other water agencies to better link land use planning with water supply planning with specific regard to potential impacts from climate change and continued implementation and enhancement of water conservation programs to reduce demand. This measure also includes County support of water conservation pricing (e.g., tiered rate structures) to encourage efficient water use. The embodied energy in water supply and usage equals 0.0085 kilowatt hours per gallon. Therefore, efficient water usage results in energy savings which has a direct reduction in GHG emissions.
- CC-1.6 requires the County to implement and expand County-wide recycling and composting programs for residents and businesses, and to require commercial and industrial recycling. Landfills are a substantial source of methane emissions in the County. This measure will divert solid waste from landfills in the region and potential GHG produced from landfills. Furthermore, recycling material consumes less energy than does the production of raw materials, further contributing to GHG reductions in accordance with AB 32.
- CC-1.7 requires the County incorporate the California ARB's recommendations for climate change CEQA thresholds into the County Guidelines for Determining Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. These thresholds will ensure that future development under the General Plan Update incorporate design features and mitigation measures that minimize or reduce GHG emissions and support achievement of AB 32 goals.

- CC-1.8 is the revision of the County Guidelines for Determining Significance based on the Climate Change Action Plan. The revisions will include guidance for proposed discretionary projects to achieve greater energy, water, waste, and transportation efficiency. This measure will ensure that future development under the General Plan Update is consistent with the Climate Change Action Plan which identifies the County's GHG reduction strategies for achieving AB 32 goals.
- CC-1.9 requires the County to coordinate with APCD, SDG&E, and the California Center for Sustainable Energy to research and possibly develop a mitigation credit program. Under this program, mitigation funds will be used to retrofit existing buildings for energy efficiency and to reduce GHG emissions.
- CC-1.10 is the implementation of the County Groundwater Ordinance, Watershed Protection Ordinance (WPO), Resource Protection Ordinance (RPO), and Multiple Species Conservation Program (MSCP), as well as preparation of the MSCP Plans for North and East County, in order to further preserve wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits. The implementation of these regulations will also restrict the use of water for cleaning outdoor surfaces and vehicles. The WPO also implements low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site.) These regulations serve to minimize development footprint and maximize natural resource preservation, thereby resulting in less GHG emissions and better capture/storage of carbon.
- CC-1.11 revises the Water Conservation Ordinance Landscape Section to further promote water conservation. These measures include:
  - The creation of water-efficient landscapes and use water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
  - The use of reclaimed water for landscape irrigation.
  - Restricting watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff.
  - Providing education about water conservation and available programs and incentives.

Water usage in this region is extremely energy intensive; therefore, implementation of water conservation requirements such as these will result in direct energy and GHG reductions in accordance with AB 32 strategies.

- CC-1.12 requires the County coordinate with resource agencies, CALFIRE, and fire districts throughout the County to minimize current wildfire risks and to plan for the potential increase in future risk that may result from Climate Change. Wildlands fires are sources of methane and are also considered to be a product of the changing climate. Loss of trees and vegetation also eliminates natural means for reducing

GHG emissions through photosynthesis. This measure ensures that the County will continue efforts to prevent wildfires both for human safety and for the health of the environment.

- CC-1.13 requires the County implement and revise as necessary, the Regional Trails Plan and Community Trails Master Plan, connecting parks and publicly accessible open space through shared pedestrian/bike paths and trails which encourage and facilitate walking and bicycling. By expanding opportunities for alternative transportation, the County can reduce GHG emissions associated with vehicle miles traveled.
- CC-1.14 requires the County to provide public education and information about options for reducing greenhouse gas emissions. In addition to addressing land development, education should also address purchasing, conservation, and recycling. Through public awareness and education, more people can be made aware of how GHG emissions are created at home. With this knowledge, much can be done to reduce day to day emissions which will help in the County's goal to achieve AB 32 targets.
- CC-1.15 is the reduction of VMT and encouragement of alternative modes of transportation through implementation of the following measures:
  - During Community Plan updates, establish policies and design guidelines that: encourage commercial centers in compact walkable configurations and discourage "strip" commercial development
  - Expand community bicycle infrastructure.
  - Revise the Off-Street Parking Design Manual to include parking placement concepts that encourage pedestrian activity and concepts for providing shared parking facilities.
  - Establish comprehensive planning principles for transit nodes such as the Sprinter Station located in North County Metro.
  - Continue to locate County facilities near transit facilities whenever feasible.
  - Coordinate with SANDAG, Caltrans, and tribal governments to maximize opportunities to locate park and ride facilities.
  - Continue to coordinate with SANDAG, Caltrans, and transit agencies to expand the mass transit opportunities in the unincorporated county and to review the location and design of transit stops. Establish a DPLU transit coordinator to ensure land use issues are being addressed.
  - Update the Zoning Ordinance to require commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles, and flex cars.

By incorporating more alternative transportation methods, including both public and private, and designing development with the emphasis on walkability and transit nodes, less VMT will be necessary to conduct day to day activities. This will reduce daily VMT and thus, will reduce GHG emissions in accordance with AB 32 strategies.

- CC-1.16 requires the County to develop and implement a Strategic Energy Plan to increase energy efficiency in existing County buildings and set standards for any new County facilities that will ultimately reduce GHG emissions. This will include implementation of the following measures as will be detailed within the Plan:
  - Improve energy efficiency within existing operations through retrofit projects, updated purchasing policies, updated maintenance/operations standards, and education.
  - Improve energy efficiency of new construction and major renovations by applying design criteria and participating in incentive programs.
  - Provide energy in a reliable and cost-effective manner and utilize renewable energy systems where feasible.
  - Monitor and reduce energy demand through metering, building controls, and energy monitoring systems.
  - Increase County fleet fuel efficiency by acquiring more hybrid vehicles, using alternative fuels, and by maintaining performance standards for all fleet vehicles.

By implementing the Strategic Energy Plan, an umbrella practice towards energy efficiency throughout County facilities can be achieved. By improving existing facilities with energy efficiency retrofits and incorporating them in new construction, the County can achieve an overall greenhouse gas emissions reduction. Furthermore, by implementing such standard best practices, the efficiency mechanisms may further extend to all areas of the region and to County staff who will continue these practices at home. This will improve the County's overall GHG reduction and help to achieve AB 32 targets.

- CC-1.17 is the preparation and implementation of a County Operations Recycling Program. This will include implementation of the following measures as will be detailed within the Program:
  - Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).
  - Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.
  - Recover by-product methane to generate electricity.
  - Provide education and publicity about reducing waste and available recycling services.

Providing recycling collection containers throughout County facilities reduces the difficulty for collection. Requiring construction and demolition waste to be alternatively disposed of further reduces waste put in the landfills, which reduces the production of methane. In addition, recycling efforts reduce the quantity of energy necessary to produce goods from a raw state. All of these steps taken by the County will reduce GHG emissions, helping to achieve AB 32 goals.

- CC-1.18 is the preparation and implementation of a County Operations Water Conservation Program. Reductions in water usage result in direct reductions of GHG
- CC-1.19 requires the County to make revisions to the Zoning Ordinance to facilitate recycling salvaged concrete, asphalt, and rock. Such recycling efforts reduce GHG emissions and help ensure that AB 32 goals are met.

**Cumulative Impact – Compliance with AB 32:** Climate change is a global phenomenon which is cumulative by nature, as it is the result of combined worldwide contributions of GHG to the atmosphere over many years. Therefore, impacts associated with the General Plan Update discussed above also serve as the cumulative impact discussion. The existing State regulations (LCFS, AB 1492, SB 1078) would reduce direct and cumulative impacts related to compliance with AB 32 and would mitigate these impacts to a level below significant. Furthermore, the proposed General Plan Update policies and mitigation measures would further reduce direct and cumulative impacts related to compliance with AB 32 and would mitigate these impacts to a level below significant.

**A-38 Significant Effect – Potential Effects of Global Climate Change on the General Plan Update:** The FEIR identifies significant impacts associated with substantial climate-related risks to public health or safety.

**Mitigation Measures:** CC-1.1 through CC-1.19

**Facts in Support of Finding:** Climate change impacts that would be most relevant to the unincorporated County, and the proposed General Plan Update, include effects on water supply, wildfires, energy needs, and impacts to public health.

The project includes policies in the Conservation and Open Space Element that address effects of climate change. The relevant policies are COS-10.7, COS-15.1, COS-15.2, COS-15.3, COS-17.1, COS-17.5, COS-18.2, COS-20.1, COS-20.2, and COS-20.4. Policy COS-10.7 encourages the installation and operation of construction and demolition (C&D) debris recycling facilities as an accessory use at permitted (or otherwise authorized) mining facilities to increase the supply of available mineral resources. Policy COS-15.1 requires that new buildings be designed and constructed to incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants. Policy COS-15.2 encourages retrofit of existing buildings to incorporate architectural features, heating and cooling, water, energy, and other design elements that improve their environmental sustainability and reduce GHG emissions. Policy COS-15.3 requires all new County facilities, as well as renovation and expansion of existing County buildings, to meet identified “green building” programs that demonstrate energy efficiency, energy conservation, and renewable technologies.

Policy COS-17.1 promotes sustainable solid waste management by requiring reduction, reuse, or recycling of all types of solid waste that is generated. Policy COS-17.5 promotes efficient methods for methane recapture in landfills and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as electricity. Policy COS-18.2 encourages use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites. Policy COS-20.1 requires preparation, maintenance, and implementation of a climate change action plan with a baseline inventory of GHG emissions from all sources, GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures. Policy COS-20.2 is the preparation and implementation of a program to monitor GHG emissions attributable to development, transportation, infrastructure, and municipal operations and periodically review the effectiveness of and revise existing programs as necessary to achieve GHG emission reduction objectives. Policy COS-20.4 promotes public education by requiring the provision of materials and programs that educate and provide technical assistance to the public, development professionals, schools, and other parties regarding the importance and approaches for sustainable development and reduction of GHG emissions. Adherence to these policies will reduce effects associated with global climate change.

In addition, the project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- CC-1.1 is the update of the County Green Building Program to increase the effectiveness of development incentives for resource conservation and energy efficiency through education. Under this program, development will result in less greenhouse gas emissions, which will improve atmospheric conditions and reduce health and safety risks.
- CC-1.2 requires the preparation of a County Climate Change Action Plan within six months from the adoption date of the General Plan Update. The Climate Change Action Plan will include an updated baseline inventory of greenhouse gas emissions from all sources and more detailed greenhouse gas emissions reduction targets and deadlines. The County Climate Change Action Plan will achieve comprehensive and enforceable GHG emissions reduction measures of 17% reduction in emissions from County operations from 2006 by 2020 and 9% reduction in community emissions from 2006 by 2020. Implementation of this Climate Change Action Plan will help the County prevent health and safety risks associated with global climate change.
- CC-1.3 requires that the County work with SANDAG to achieve regional goals in reducing GHG emissions associated with land use and transportation. Although the County has no jurisdiction over vehicle emissions, certain land use decisions can contribute to a reduction in vehicle miles traveled (VMT). By working with SANDAG as it incorporates sustainable communities strategies in its 2050 Regional

Transportation Plan, measurable GHG reductions will be achieved that directly improve environmental conditions and reduce public health risks.

- CC-1.4 is the review of traffic operations to implement measures that improve flow and reduce idling such as improving traffic signal synchronization and decreasing stop rate and time. Vehicle idling leads to unnecessary fuel consumption and GHG emissions. Idling reduction can substantially reduce GHG emissions generated by vehicles on County roads.
- CC-1.5 is the coordination with the San Diego County Water Authority and other water agencies to better link land use planning with water supply planning with specific regard to potential impacts from climate change and continued implementation and enhancement of water conservation programs to reduce demand. This measure also includes County support of water conservation pricing (e.g., tiered rate structures) to encourage efficient water use. The embodied energy in water supply and usage equals 0.0085 kilowatt hours per gallon. Therefore, efficient water usage results in energy savings, which has a direct reduction in GHG emissions.
- CC-1.6 requires the County to implement and expand County-wide recycling and composting programs for residents and businesses, and to require commercial and industrial recycling. Landfills are a substantial source of methane emissions in the County. This measure will divert solid waste from landfills in the region and reduce potential GHG produced from landfills. Furthermore, recycling material consumes less energy than does the production of raw materials, further contributing to GHG reductions.
- CC-1.7 requires the County incorporate the California ARB's recommendations for climate change CEQA thresholds into the County Guidelines for Determining Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. These thresholds will ensure that future development under the General Plan Update incorporate design features and mitigation measures that minimize or reduce GHG emissions, thereby reducing environmental impacts and public health and safety effects associated with climate change.
- CC-1.8 is the revision of the County Guidelines for Determining Significance based on the Climate Change Action Plan. The revisions will include guidance for proposed discretionary projects to achieve greater energy, water, waste, and transportation efficiency. This measure will ensure that future development under the General Plan Update is consistent with the Climate Change Action Plan which identifies milestones toward establishing a safe and livable environment.

- CC-1.9 requires the County to coordinate with APCD, SDG&E, and the California Center for Sustainable Energy to research and possibly develop a mitigation credit program. Under this program, mitigation funds will be used to retrofit existing buildings for energy efficiency and to reduce GHG emissions.
- CC-1.10 is the implementation of the County Groundwater Ordinance, Watershed Protection Ordinance (WPO), Resource Protection Ordinance (RPO), and Multiple Species Conservation Program (MSCP), as well as preparation of the MSCP Plans for North and East County, in order to further preserve wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits. The implementation of these regulations will also restrict the use of water for cleaning outdoor surfaces and vehicles. The WPO also implements low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site.) These regulations serve to minimize development footprint and maximize natural resource preservation, thereby resulting in less GHG emissions and better capture/storage of carbon.
- CC-1.11 revises the Water Conservation Ordinance Landscape Section to further promote water conservation. These measures include:
  - The creation of water-efficient landscapes and use water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
  - The use of reclaimed water for landscape irrigation.
  - Restricting watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff.
  - Providing education about water conservation and available programs and incentives.

Water usage in this region is extremely energy intensive; therefore, implementation of water conservation requirements such as these will result in direct energy savings, GHG reductions, and provision of sufficient water supply throughout the County.

- CC-1.12 requires the County coordinate with resource agencies, CALFIRE, and fire districts throughout the County to minimize current wildfire risks and to plan for the potential increase in future risk that may result from Climate Change. Wildlands fires are sources of methane and are also considered to be a product of the changing climate. Loss of trees and vegetation also eliminates natural means for reducing GHG emissions through photosynthesis. This measure ensures that the County will continue efforts to prevent wildfires both for human safety and for the health of the environment.
- CC-1.13 requires the County implement and revise as necessary, the Regional Trails Plan and Community Trails Master Plan, connecting parks and publicly accessible open space through shared pedestrian/bike paths and trails which encourage and



facilitate walking and bicycling. By expanding opportunities for alternative transportation, the County can reduce GHG emissions associated with vehicle miles traveled.

- CC-1.14 requires the County to provide public education and information about options for reducing greenhouse gas emissions. In addition to addressing land development, education should also address purchasing, conservation, and recycling. Through public awareness and education, more people can be made aware of how greenhouse gas emissions are created at home. With this knowledge, more can be done to reduce day to day emissions which will help minimize public health and safety risks associated with climate change.
- CC-1.15 is the reduction of VMT and encouragement of alternative modes of transportation through implementation of the following measures:
  - During Community Plan updates, establish policies and design guidelines that: encourage commercial centers in compact walkable configurations and discourage “strip” commercial development
  - Expand community bicycle infrastructure.
  - Revise the Off-Street Parking Design Manual to include parking placement concepts that encourage pedestrian activity and concepts for providing shared parking facilities.
  - Establish comprehensive planning principles for transit nodes such as the Sprinter Station located in North County Metro.
  - Continue to locate County facilities near transit facilities whenever feasible.
  - Coordinate with SANDAG, Caltrans, and tribal governments to maximize opportunities to locate park and ride facilities.
  - Continue to coordinate with SANDAG, Caltrans, and transit agencies to expand the mass transit opportunities in the unincorporated county and to review the location and design of transit stops. Establish a DPLU transit coordinator to ensure land use issues are being addressed.
  - Update the Zoning Ordinance to require commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles, and flex cars.

By incorporating more alternative transportation methods, including both public and private, and designing development with the emphasis on walkability and transit nodes, less VMT will be necessary to conduct day to day activities. This will reduce daily VMT and thus, will reduce GHG emissions. Moreover, these efforts will help establish safe and livable communities for County residents.

- CC-1.16 requires the County to develop and implement a Strategic Energy Plan to increase energy efficiency in existing County buildings and set standards for any new County facilities that will ultimately reduce GHG emissions. This will include implementation of the following measures as will be detailed within the Plan:

- Improve energy efficiency within existing operations through retrofit projects, updated purchasing policies, updated maintenance/operations standards, and education.
- Improve energy efficiency of new construction and major renovations by applying design criteria and participating in incentive programs.
- Provide energy in a reliable and cost-effective manner and utilize renewable energy systems where feasible.
- Monitor and reduce energy demand through metering, building controls, and energy monitoring systems.
- Increase County fleet fuel efficiency by acquiring more hybrid vehicles, using alternative fuels, and by maintaining performance standards for all fleet vehicles.

By implementing the Strategic Energy Plan, an umbrella practice towards energy efficiency throughout County facilities can be achieved. By improving existing facilities with energy efficiency retrofits and incorporating them in new construction, the County can achieve an overall greenhouse gas emissions reduction.

Furthermore, by implementing such standard best practices, the efficiency mechanisms may further extend to all areas of the region and to County staff who will continue these practices at home. This will improve the County's overall GHG reduction efforts and improve public health and safety conditions.

- CC-1.17 is the preparation and implementation of a County Operations Recycling Program. This will include implementation of the following measures as will be detailed within the Program:
  - Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).
  - Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.
  - Recover by-product methane to generate electricity.
  - Provide education and publicity about reducing waste and available recycling services.

Providing recycling collection containers throughout County facilities reduces the difficulty for collection. Requiring construction and demolition waste to be alternatively disposed of further reduces waste put in the landfills, which reduces the production of methane. In addition, recycling efforts reduce the quantity of energy necessary to produce goods from a raw state. All of these steps taken by the County will reduce greenhouse gas emissions.

- CC-1.18 is the preparation and implementation of a County Operations Water Conservation Program. Reductions in water usage result in direct reductions of GHG emissions.
- CC-1.19 requires the County to make revisions to the Zoning Ordinance to facilitate recycling salvaged concrete, asphalt, and rock. Such recycling efforts reduce GHG

emissions and help ensure that public and health and safety risks associated with climate change are minimized.

### **Cumulative Impact – Effects of Global Climate Change on the General Plan**

**Update:** Climate change is a global phenomenon which is cumulative by nature, as it is the result of combined worldwide contributions of GHG to the atmosphere over many years. Therefore, significant direct impacts associated with the General Plan Update discussed above also serve as the cumulative impact discussion. The proposed General Plan policies and mitigation measures discussed above, in addition to compliance with applicable regulations such as the CAA, Lieberman-Warner Climate Security Act, CARB standards, Title 24 standards, Executive Order S-3-05, AB 32, Executive Order S-01-07, SB 97, SB 1368, SB 1078, APCD standards and existing County programs and policies, would mitigate the potential direct and cumulative impacts of global climate change to a level below significant.

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## **Section B – Finding (2)**

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Pursuant to Section 15091(a)(2) of the State CEQA Guidelines, the County Board of Supervisors finds that, for each of the following significant effects as identified in the FEIR, changes or alterations which would avoid or substantially lessen these significant effects are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. The significant effects (Impacts) and Mitigation Measures are stated fully in the FEIR. The following are brief explanations of the rationale for this finding for each Impact:

### ***BIOLOGICAL RESOURCES***

**B-1 Significant Effect – Special Status Species:** The FEIR identifies significant impacts, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Bio-1.1 is the preparation of a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, and Groundwater Ordinance. This program will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must

be done with consideration of community character through planning group coordination and/or findings required for project approval.

- Bio-1.2 requires the County to implement and revise existing Habitat Conservation Plans/Policies to preserve sensitive resources within a cohesive system of open space; and to continue preparation of Multiple Species Conservation Program (MSCP) Plans for North County and East County. Implementation of the existing South County MSCP has been very effective in preserving candidate species and their habitat as intended; and this measure will ensure that this success is continued and carried forward to future MSCP efforts.
- Bio-1.3 requires the County to implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP Subarea Plan. This measure will benefit sensitive species by preserving sizeable areas of habitat in the unincorporated County.
- Bio-1.4 requires the County to coordinate with nonprofit groups and other agencies to acquire preserve lands. This measure will help continue the County's success with acquiring large areas of open space that are utilized by resident and migratory special status species throughout the region.
- Bio-1.5 directs the County to utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources, and to utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special status species populations on or near project sites. This information will be used to avoid or mitigate potential project impacts in the County as appropriate.
- Bio-1.6 is the implementation of the Resource Protection Ordinance (RPO), the Biological Mitigation Ordinance (BMO), and the Habitat Loss Permit (HLP) Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. These ordinances are part of the County regulatory code and explicitly mandate preservation of sensitive biological resources.
- Bio-1.7 requires the County to minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. Implementation of these ordinances reduces potential indirect impacts to special status species and their habitats.

The project also includes policies in the Conservation and Open Space Element and the Land Use Element that address special status species and their habitats. The relevant policies are: COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, and LU-10.2. These policies require monitoring, management and maintenance of a regional preserve system, facilitate preserve assembly and funding, help minimize edge effects, facilitate preparation of habitat conservation plans and resource management plans, direct development to avoid and/or preserve habitat, provide for long-term sustainability of the natural environment, and encourage contiguous open space areas that protect wildlife habitat and corridors. Adherence to these policies will further reduce impacts to special status species from future development.

**Facts in Support of Finding:** The General Plan Update would have the potential to result in direct and/or indirect impacts to special status plant and wildlife species and their habitat from the development of land uses proposed under this alternative. It is estimated that the Project could result in 150,642 acres of direct impacts to habitats that would have the potential to support special status plant and wildlife species. General Plan Update policies and mitigation measures would reduce impacts to special status species, but not to below a level of significance.

The following measure was also considered to reduce impacts to special status species to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- (1) Measure: Adopt MSCP Plans for North County and East County that provide coverage for special status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions.

**Rationale for Rejection:** This measure is feasible and attainable as the County is currently in the process of preparing such plans. However, these conservation plans require approval at the federal and State levels, which the County cannot be assured of. In addition, the timing of these programs (i.e., MSCP adoption and implementation) may not coincide with General Plan Update impacts in these areas. While MSCP Plans or similar programs can be implemented without concurrence from other agencies, some of the primary benefits associated with these Habitat Conservation Plans (HCPs) and Natural Community Conservation Planning (NCCP) programs would be lost by doing so. This is because HCPs/NCCPs allow for take of specified federal and state listed species. These “take permits” benefit private landowners in the County as well as numerous public projects which could not be accomplished without a comprehensive conservation plan that addresses multiple species. Given the costs associated with such plans, as well as the public support needed to get them approved and implemented, it is not feasible to adopt MSCP or similar plans for North County and East County without achieving the maximum

benefit possible for the public. Therefore, to implement similar plans that would effectively mitigate General Plan Update impacts to special status species in North County and East County to a level below significance without the included assurances from federal and State permitting agencies would not be feasible for economic and political reasons.

None of the project alternatives would reduce impacts associated with special status species to below significant. While the Environmentally Superior Alternative would further reduce the impacts to special status species, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to special status species would remain significant and unavoidable.

**Cumulative Impact – Special Status Species:** As described above, implementation of the proposed General Plan Update would have the potential to impact, either directly or through habitat modifications, species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS. In combination with other cumulative projects, the General Plan Update would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Cumulative projects located in the San Diego region would have the potential to result in impacts to special status plant and wildlife species, including loss of habitat. Without a comprehensive NCCP in place for the long-term protection of special status plant and wildlife species for the entire southern California region, a cumulative loss of habitat supporting special status plant and wildlife species would occur, even after mitigation has been implemented for individual projects. Therefore, a significant cumulative impact associated with special status plant and wildlife species would occur.

General Plan Update policies and mitigation measures would reduce cumulative impacts to special status species, but not to below a level of significance. The County has adopted an MSCP South County Subarea Plan for the southwestern portion of the County, but is still developing MSCP Plans for North County and East County areas. Therefore, until the County has adopted the North County and East County Plans with concurrence from State and federal agencies, the project's contribution, in combination with other cumulative projects, would be cumulatively considerable.

**B-2 Significant Effect – Riparian Habitat and Other Sensitive Natural Communities:** The FEIR identifies significant impacts on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFG or USFWS.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Bio-1.1 is the preparation of a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, and Groundwater Ordinance. This program will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of community character through planning group coordination and/or findings required for project approval.
- Bio-1.2 requires the County to implement and revise existing Habitat Conservation Plans/Policies to preserve sensitive resources within a cohesive system of open space; and to continue preparation of Multiple Species Conservation Program (MSCP) Plans for North County and East County. Implementation of the existing South County MSCP has been very effective in preserving riparian habitat and other sensitive natural communities; and this measure will ensure that this success is continued and carried forward to future MSCP efforts.
- Bio-1.3 requires the County to implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP Subarea Plan. This measure preserves riparian habitat and other sensitive natural communities in the unincorporated County.
- Bio-1.4 requires the County to coordinate with nonprofit groups and other agencies to acquire preserve lands. This measure will help continue the County's success with acquiring large areas of open space that contain riparian habitat and other sensitive natural communities throughout the region.
- Bio-1.5 directs the County to utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources, and to utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special status species populations on or near project sites. This information will be used to avoid or mitigate potential project impacts to sensitive habitats in the County as appropriate.
- Bio-1.6 is the implementation of the Resource Protection Ordinance (RPO), the Biological Mitigation Ordinance (BMO), and the Habitat Loss Permit (HLP) Ordinance

to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. These ordinances are part of the County regulatory code and explicitly mandate preservation of sensitive biological resources.

- Bio-1.7 requires the County to minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. Implementation of these ordinances reduces potential indirect impacts to riparian habitat and other sensitive natural communities.
- Bio-2.1 requires the County to revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development. For applicable project subject to this ordinance, this measure will prevent indirect impacts to riparian habitat and other sensitive natural communities associated with invasive plant species.
- Bio-2.2 is the requirement that development projects obtain Clean Water Act (CWA) Section 401/404 permits issued by the California Regional Water Quality Control Board and U.S. Army Corps of Engineers for all project-related disturbances of waters of the U.S. and/or associated wetlands. It further requires that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game for all project-related disturbances of streambeds. By identifying the need for these permits, the County can ensure that applicable mitigating measures required or requested by these agencies can be included for such projects.
- Bio-2.3 is the requirement that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values. While this preservation requirement is applied to project permits subject to the Resource Protection Ordinance, this mitigation measure ensures that the same level of protection is applied whenever feasible to other projects. As such, potential impacts to riparian habitat and other sensitive natural communities will be reduced.
- Bio-2.4 is the implementation of the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands. By applying these provisions to development projects, potential indirect impacts to riparian habitat and other sensitive natural communities from stormwater runoff will be reduced.



The project also includes policies in the Conservation and Open Space Element and the Land Use Element that address riparian habitat and other sensitive natural communities. The relevant policies are: COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, COS-3.1, LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, and LU-10.2. These policies require monitoring, management and maintenance of a regional preserve system, facilitate preserve assembly and funding, help minimize edge effects, facilitate preparation of habitat conservation plans and resource management plans, direct development to avoid and/or preserve habitat, provide for long-term sustainability of the natural environment, and encourage contiguous open space areas that protect wildlife habitat and corridors. Adherence to these policies will further reduce impacts to riparian habitat and other sensitive natural communities from future development.

**Facts in Support of Finding:** The General Plan Update would have the potential to result in direct and/or indirect loss of riparian habitat and other sensitive natural communities by the removal or destruction of such habitat for new development or infrastructure. Potential indirect impacts include adverse effects to water quality in riparian habitat from pollutants in runoff and sedimentation during construction, and fugitive dust produced by construction that would have the potential to disperse onto sensitive vegetation adjacent to construction sites. It is estimated that the Project could result in 150,642 acres of direct impacts to habitats, approximately 8,668 acres of which would qualify as riparian habitat. General Plan Update policies and mitigation measures would reduce impacts to special status species, but not to below a level of significance.

The following measure was also considered to reduce impacts to riparian habitat and other sensitive natural communities to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- (1) Measure: Adopt MSCP Plans for North County and East County that provide coverage for special status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions.

**Rationale for Rejection:** This measure is feasible and attainable as the County is currently in the process of preparing such plans. However, these conservation plans require approval at the federal and State levels, which the County cannot be assured of. In addition, the timing of these programs (i.e., MSCP adoption and implementation) may not coincide with General Plan Update impacts in these areas. While MSCP Plans or similar programs can be implemented without concurrence from other agencies, some of the primary benefits associated with these Habitat Conservation Plans (HCPs) and Natural Community Conservation Planning (NCCP) programs would be lost by doing so. This is because HCPs/NCCPs allow for take of specified federal and state listed species. These “take permits” benefit private landowners in the County as well as numerous public projects which could not be accomplished without a comprehensive conservation plan that addresses multiple

species. Given the costs associated with such plans, as well as the public support needed to get them approved and implemented, it is not feasible to adopt MSCP or similar plans for North County and East County without achieving the maximum benefit possible for the public. Therefore, to implement similar plans that would effectively mitigate General Plan Update impacts to riparian habitat and other sensitive natural communities in North County and East County to a level below significance without the included assurances from federal and State permitting agencies would not be feasible for economic and political reasons.

None of the project alternatives would reduce impacts to riparian habitat and other sensitive natural communities to below significant. While the Environmentally Superior Alternative would further reduce the impacts to riparian habitat and other sensitive natural communities, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to riparian habitat and other sensitive natural communities would remain significant and unavoidable.

**Cumulative Impact – Riparian Habitat and Other Sensitive Natural Communities:**

As described above, implementation of the proposed General Plan Update would have the potential to result in significant impacts to riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFG or USFWS. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Cumulative projects located in the San Diego region have the potential to result in impacts to riparian habitat and other sensitive natural communities if in combination they would cause direct and/or indirect loss or degradation. State regulations such as the California Lake and Streambed Alteration Program or the California NCCP Act provide protections for riparian and other sensitive habitats. In addition, many projects that affect riparian or other protected habitat types require approval from the USFWS and the CDFG. If potentially significant impacts would occur from particular cumulative projects, then mitigation measures would be implemented to reduce impacts to the extent feasible. However, without a comprehensive NCCP in place for the long-term protection of sensitive natural communities for the entire southern California region, a cumulative loss of riparian and other sensitive habitat would occur, even after mitigation has been implemented for individual projects. Therefore, a significant cumulative impact

General Plan Update policies and mitigation measures would reduce cumulative impacts to riparian habitat and other sensitive natural communities, but not to below a level of significance. The County has adopted an MSCP South County Subarea Plan for the southwestern portion of the County, but is still developing MSCP Plans for North County and East County areas. Therefore, until the County has adopted the North County and East County Plans with concurrence from State and federal agencies, the project's contribution, in combination with other cumulative projects, would be cumulatively considerable.

**B-3 Significant Effect – Wildlife Movement Corridors and Nursery Sites:** The FEIR identifies significant impacts that would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Bio-1.1 is the preparation of a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, and Groundwater Ordinance. This program will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of community character through planning group coordination and/or findings required for project approval.
- Bio-1.2 requires the County to implement and revise existing Habitat Conservation Plans/Policies to preserve sensitive resources within a cohesive system of open space; and to continue preparation of Multiple Species Conservation Program (MSCP) Plans for North County and East County. Implementation of the existing South County MSCP has been very effective in preserving wildlife movement corridors and nursery sites; and this measure will ensure that this success is continued and carried forward to future MSCP efforts.
- Bio-1.3 requires the County to implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP Subarea Plan. This measure preserves wildlife movement corridors and nursery sites in the unincorporated County.
- Bio-1.4 requires the County to coordinate with nonprofit groups and other agencies to acquire preserve lands. This measure will help continue the County's success with acquiring large areas of open space that contain wildlife movement corridors and nursery sites throughout the region.

- Bio-1.5 directs the County to utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources, and to utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special status species populations on or near project sites. This information will be used to avoid or mitigate potential project impacts to wildlife movement corridors and nursery sites in the County as appropriate.
- Bio-1.6 is the implementation of the Resource Protection Ordinance (RPO), the Biological Mitigation Ordinance (BMO), and the Habitat Loss Permit (HLP) Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. These ordinances are part of the County regulatory code and explicitly mandate preservation of sensitive biological resources.
- Bio-1.7 requires the County to minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. Implementation of these ordinances reduces potential indirect impacts wildlife movement corridors and nursery sites.
- Bio-2.3 is the requirement that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values. While this preservation requirement is applied to project permits subject to the Resource Protection Ordinance, this mitigation measure ensures that the same level of protection is applied whenever feasible to other projects. As such, potential impacts to wildlife movement corridors and nursery sites will be reduced.

The project also includes policies in the Conservation and Open Space Element and Land Use Element that address wildlife movement corridors and/or nursery sites. The relevant policies are: COS-1.1 through COS-1.5, LU-6.1, LU-6.7. These policies allow creation, protection, maintenance and management of a coordinated biological preserve system that includes Biological Resource Core Areas, wildlife corridors, and linkages to allow wildlife to travel throughout their habitat ranges. Policy COS-1.2 prohibits private development within established preserves. Adherence to these policies will further reduce impacts to wildlife movement corridors and nursery sites from future development.

**Facts in Support of Finding:** The General Plan Update would have the potential to result in impacts to wildlife movement corridors and the use of native wildlife nursery sites. Development associated with the designated land uses would have potentially significant direct and indirect impacts to sensitive habitats, including habitats that

currently function as a wildlife movement corridor or a nursery site. General Plan Update policies and mitigation measures would reduce impacts to wildlife movement corridors and nursery sites, but not to below a level of significance.

The following measure was also considered to reduce impacts to wildlife movement corridors and nursery sites to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- (1) Measure: Adopt MSCP Plans for North County and East County that provide coverage for special status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions.

Rationale for Rejection: This measure is feasible and attainable as the County is currently in the process of preparing such plans. However, these conservation plans require approval at the federal and State levels, which the County cannot be assured of. In addition, the timing of these programs (i.e., MSCP adoption and implementation) may not coincide with General Plan Update impacts in these areas. While MSCP Plans or similar programs can be implemented without concurrence from other agencies, some of the primary benefits associated with these Habitat Conservation Plans (HCPs) and Natural Community Conservation Planning (NCCP) programs would be lost by doing so. This is because HCPs/NCCPs allow for take of specified federal and state listed species. These “take permits” benefit private landowners in the County as well as numerous public projects which could not be accomplished without a comprehensive conservation plan that addresses multiple species. Given the costs associated with such plans, as well as the public support needed to get them approved and implemented, it is not feasible to adopt MSCP or similar plans for North County and East County without achieving the maximum benefit possible for the public. Therefore, to implement similar plans that would effectively mitigate General Plan Update impacts to wildlife movement corridors and nursery sites in North County and East County to a level below significance without the included assurances from federal and State permitting agencies would not be feasible for economic and political reasons.

None of the project alternatives would reduce impacts to wildlife movement corridors and nursery sites to below significant. While the Environmentally Superior Alternative would further reduce the impacts to riparian habitat and other sensitive natural communities, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and project design measures would not

achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to wildlife movement corridors and nursery sites would remain significant and unavoidable.

**Cumulative Impact – Wildlife Movement Corridors and Nursery Sites:** As described above, implementation of the proposed General Plan Update would have the potential to result in significant impacts that would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with wildlife movement corridors and nursery sites. Applicable federal and/or State regulations such as the California NCCP Act provide protections for wildlife movement corridors and nursery sites. However, without a comprehensive NCCP in place for the long-term protection of wildlife movement corridors and nursery sites for the entire southern California region, a cumulative loss of wildlife movement corridors and nursery sites would occur, even after mitigation has been implemented for individual projects. Therefore, a significant cumulative impact associated with wildlife movement corridors and nursery sites would occur.

General Plan Update policies and mitigation measures would reduce cumulative impacts to wildlife movement corridors and nursery sites, but not to below a level of significance. The County has adopted an MSCP South County Subarea Plan for the southwestern portion of the County, but is still developing MSCP Plans for North County and East County areas. Therefore, until the County has adopted the North County and East County Plans with concurrence from State and federal agencies, the project's contribution, in combination with other cumulative projects, would be cumulatively considerable.

## ***PUBLIC SERVICES***

**B-4 Significant Effect – School Services:** The FEIR identifies significant impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Pub-1.1 requires the County to participate in interjurisdictional reviews to gather information on and review and provide comments on plans for new or expanded

governmental facilities in the region. This will ensure that potential environmental impacts associated with new or expanded school services are identified and adequate mitigation is requested.

- Pub-1.2 requires that the County plan and site governmental facilities that are context-specific according to their location in village, semi-rural, or rural lands. This will minimize potential environmental effects that result from incompatible uses (e.g., visual impacts, noise impacts, groundwater impacts, etc.).
- Pub-1.3 is the revision of Board Policy I-63 to minimize leapfrog development and to establish specific criteria for General Plan Amendments proposing expansion of areas designated Village regional category. This is intended to limit unexpected demands for new or expanded public services and the associated governmental facilities.
- Pub-3.1 requires the County to coordinate with school districts to encourage siting new facilities in accordance with the County's General Plan and encourage implementing feasible mitigation measures to mitigate environmental impacts. This will help prevent or reduce significant impacts associated with the construction or expansion of school facilities.
- Pub-3.2 requires the County to implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available school districts. This measure ensures that provision of school facilities is considered prior to new discretionary projects such as residential subdivisions that would potentially necessitate construction or expansion of such services.

The project also includes policies in the Land Use Element that address the provision of new or expanded school services. The relevant policies are: LU-1.4, LU-9.7, LU-12.3, LU-12.4, LU-17.1 through LU-17.4, and LU-18.2. These policies limit village expansions subject to public services availability, encourage the placement of new schools development within town centers and villages, guide development with compatibility of infrastructure and services, set standards for new school development in a manner that would reduce hazardous, transportation and visual impacts, and encourage the co-location of civic uses such as libraries, community centers, parks and schools. Adherence to these policies will further reduce impacts associated with school services.

**Facts in Support of Finding:** School districts offer education to all school-age residents of the region, but operate entirely independent of the County of San Diego government. School districts were created by the State and are subject to the overview of the State Legislature. Elected governing school boards are responsible for budgeting and decision-making. The State Department of Education establishes school site and construction standards. It is anticipated that the majority of school districts serving

unincorporated San Diego County will experience growth under the General Plan Update, thereby necessitating the construction or expansion of school facilities.

The County does not have the authority to plan, design, approve or construct school facilities; that is the responsibility of individual school districts that serve as their own lead agency under CEQA. However, the County may have permit or land use authority if it is a responsible agency. Due to the County's limited authority over the construction or expansion of school facilities, the County would not be able to ensure that the construction of new facilities would have a less than significant impact on the environment. Therefore, even with the implementation of the above policies and mitigation measures, impacts would be significant and unavoidable.

None of the project alternatives would reduce impacts associated with school services to below significant. While the Environmentally Superior Alternative would further reduce demand for school facilities, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the County does not have authority to ensure impacts are mitigated below significant; because application of all feasible mitigation and project design measures would not necessarily achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with school services would remain significant and unavoidable.

**Cumulative Impact – School Services:** As described above, implementation of the General Plan Update would have the potential to necessitate provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Cumulative projects located in the San Diego region that involve residential development would have the potential to increase the public school population in the region and require the construction or expansion of school facilities so that adequate service ratios are maintained. The General Plan Update would increase demand for school facilities requiring the provision of new or physically altered school facilities, which would have a cumulatively considerable contribution to this impact.

General Plan Update policies and mitigation measures would reduce cumulative impacts associated with school services, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. School districts would act as the lead agency to approve school



related construction projects, and therefore the County would not be able to ensure that the construction of new school facilities would not have significant impacts to the environment. Therefore, project impacts associated with school services would remain cumulatively considerable.

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## **Section C – Finding (3)**

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Pursuant to Section 15091(a)(3) of the State CEQA Guidelines, the County Board of Supervisors finds that, for each of the following significant effects identified in the FEIR, specific economic, legal, social, technological, or other considerations make the mitigation measures or project alternatives infeasible:

### ***AESTHETICS***

**C-1 Significant Effect – Visual Character or Quality:** The FEIR identifies significant impacts from future development that would substantially degrade the existing visual character or quality of the areas of the project and its surroundings by introducing features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Aes-1.1 is the adoption of a General Plan Regional Category Map and Land Use Maps which locate land uses of less density or intensity on lands that contribute to scenic vistas. This will reduce potential contrasts that future development in proximity to scenic vistas may have with the surrounding setting.
- Aes-1.2 requires protection of sensitive biological habitats and species through regulations that require avoidance and mitigation of impacts, such as through the Biological Mitigation Ordinance, the Resource Protection Ordinance, and Habitat Loss Permit Ordinance. By conserving natural resources, these regulations also preserve the visual character and quality of a large portion of the project area.
- Aes-1.3 is the update of community plans with improved vision and community character statements to ensure that new development reflects the character and visions for each individual unincorporated community. This will better clarify what developments need to do to maintain community character and visual quality of an area.

- Aes-1.4 is the revision of the Design Review process to streamline the process, improve consistency in implementation, and update design criteria as necessary. Current components of that process include Special Area Designators, Design Review Guidelines, and the Site Plan review and approval process. This will allow a more current and consistent approach to a subjective issue, thereby ensuring that surrounding visual quality and character are considered during the site design process to minimize potential impacts.
- Aes-1.5 is the preparation and implementation of a Conservation Subdivision Program that facilitates conservation-oriented project design. Under this program, future subdivisions will be encouraged to use preserve design standards to conserve resources on site and minimize impacts to natural resources. Such a program would guide preservation adjacent to other open space areas. Thus, new subdivisions will be less likely to degrade existing visual character or quality.
- Aes-1.6 requires community review and specific compatibility findings for development projects that may have significant adverse effects on the scenic quality of the community. This will ensure that project designs are compatible with the surrounding context.
- Aes-1.7 is the development and implementation of programs and regulations that preserve agricultural lands. Agricultural lands are often key components of scenic vistas and community character. Therefore, preservation of these lands will help to minimize potential impacts to scenic resources.
- Aes-1.8 is the continuation and implementation of programs and regulations that minimize landform alteration and preserve ridgelines and steep slopes where appropriate. This measure will protect the County's unique topography which adds to the visual quality of the unincorporated area.
- Aes-1.9 requires that the County work with communities and other stakeholders to identify key scenic vistas, viewsheds of County scenic roads and highways, and other areas of specific scenic value. It further requires application of Resource Conservation Area designations or other special area designators, guidelines, and tools to guide future development of parcels within these viewsheds to avoid impacts to scenic vistas. This cooperative effort among stakeholders and the subsequent changes in land use regulations will ensure that future development near important visual resources will avoid or mitigate potential impacts to the surrounding visual character.
- Aes-1.10 requires the County to participate in local and regional planning efforts with other agencies. This includes participation in SANDAG and other regional planning forums, reviewing and commenting on planning and environmental documents issued by other agencies, and ongoing collaboration with Native

American tribes and adjacent jurisdictions. In so doing, the County will be able to better identify important visual resources within or near its land use jurisdiction and ensure that future development be designed or screened such that it will not adversely affect the nearby visual character or quality.

- Aes-1.11 requires implementation of the Wireless Communications Ordinance and BOS Policies I-92 and J-17 to encourage the undergrounding of utilities. Combined with the on-going effort to convert existing overhead utilities, this measure will substantially reduce potential impacts to scenic resources from overhead utilities throughout the County unincorporated area.
- Aes-3.1 is the update of County road standards to provide standards related to road design, parking, landscaping, and elements of the public realm that are critical to the character of a community. These standards would reduce or prevent potential visual impacts associated with road improvements that would otherwise conflict with the character of the surrounding community or setting.
- Aes-3.2 is the implementation of existing, and preparation of new, community right-of-way development standards, as appropriate, that supplement the County road standards in order to recognize the unique constraints and character of different communities. These standards will further provide setting-specific guidance that would minimize potential community character impacts from future road improvements.

The project also includes policies in the Land Use, Mobility and Housing Elements which would reduce the potential for visual character and quality impacts. The relevant policies are: LU-1.4, LU-2.1, LU-2.3, LU-2.5, LU-4.1, LU-4.2, LU-4.3, LU-4.4, LU-11.2, LU-12.4, M-10.6, and H-2.1. These policies require community plans to be maintained, guide development to reflect community character, assign appropriate densities and minimum lot sizes, limit expansions of village densities unless consistent with community character, require regional coordination, plan for infrastructure to match community character, limit and guide parking in rural areas, and require that development in existing residential areas respect the surrounding character. Adherence to these policies will further reduce impacts associated with visual character or quality from future development.

**Facts in Support of Finding:** Implementation of the General Plan Update would accommodate intensified development, especially in town centers, which has the potential to result in the degradation of, or substantial change in, the existing visual character or quality of communities throughout the unincorporated County. General Plan Update policies and mitigation measures (described above), have been identified that would reduce these impacts, but not to below a level of significance.

The following measures were also considered to reduce impacts to visual character or quality to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- (1) Measure: Require revised goals and policies to be prepared and incorporated into community plans that would severely limit the potential for development growth in order to maintain the existing visual character or quality of each community.

Rationale for rejection: Severe restrictions on the type or amount of development within a community would conflict with areas identified for increased growth under the General Plan Update and with one of the primary Plan Objectives to support a reasonable share of projected regional population growth. In addition, such restrictions would not permit the plan to accomplish the goal of reinforcing the vitality, local economy and individual character of existing communities while balancing housing, employment and recreational opportunities because it would restrict any form of development. Therefore, this measure is rejected as not meeting the goals of the project. The measure would also conflict with goals of the Housing Element to provide sufficient housing stock.

- (2) Measure: Comprehensively expand the Zoning Ordinance to specifically dictate the exact development type and design allowed in the various areas of the County to avoid impacts to community character. This measure would be the equivalent of preparing detailed land development master plans for the entire County.

Rationale for rejection: This measure is infeasible because of the extent and diversity of communities that exist within the County. While the County intends to improve the Zoning Ordinance and associated Design Review Guidelines for some areas, as well as prepare town center plans where appropriate, comprehensive coverage of all unincorporated areas in this manner is not feasible.

- (3) Measure: Approve only development that is comparable in size, scope, and use as existing development in order to avoid impacts to the visual character and quality of the County's communities.

Rationale for rejection: This measure would be infeasible because it would result in restrictions on future development in areas identified for increased growth in the General Plan Update and/or areas where existing land uses are not the same as the land uses proposed by the General Plan Update. In addition, in some areas, the existing size, scope and use are not environmentally sensitive and this would not allow more innovative land use approaches. Therefore, this measure would also conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the project which is to accommodate a reasonable share of regional growth.

None of the project alternatives would completely eliminate impacts to visual character or quality. While the Environmentally Superior Alternative would reduce the impacts to visual character and quality, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to visual character and quality would remain significant and unavoidable.

**Cumulative Impact – Visual Character or Quality:** As described above, implementation of the proposed General Plan Update would have the potential to degrade the existing visual character or quality of a community. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to visual character or quality if, in combination, they would substantially degrade the existing visual character or quality of the site and its surroundings by introducing features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area. A cumulative impact to community character may occur from projects already in process in the County that would not be consistent with the General Plan Update. Additionally, projects in Mexico or on tribal lands may not be subject to regulations protecting community character, or they may have different standards. Therefore, the cumulative projects in the region would have the potential to result in a significant cumulative impact related to visual character or quality. The General Plan Update would have a cumulatively considerable contribution to this impact.

General Plan Update policies and mitigation measures would reduce cumulative impacts to visual character and quality, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to visual character or quality would remain cumulatively considerable for the reasons noted above. .

**C-2 Significant Effect – Light or Glare:** The FEIR identifies significant impacts from future development that would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

The proposed General Plan Update would have the potential to result in increased light within the County that would adversely affect day or nighttime views. The proposed General Plan Update policies and mitigation measures would reduce direct impacts associated with increased light, but not to below a level of significance.

- Aes-4.1 requires the County to coordinate with communities and stakeholders to review light pollution controls and consider amendments or expansions to those controls as determined necessary to reduce impacts to dark skies that are important to community character. This will ensure that potential artificial lighting impacts from development are monitored and controlled as needed to preserve community character.
- Aes-4.2 requires the County to maintain light and glare regulations that minimize impacts to adjacent properties, sensitive areas, community character, observatories, and dark skies. These regulations are currently found in the Light Pollution Code and Zoning Ordinance. Additional reviews are implemented on discretionary projects in accordance with CEQA and the County's CEQA guidelines. These efforts will help protect the existing unincorporated area and surrounding environment from excessive artificial lighting impacts.
- Aes-4.3 is the participation in local and regional planning to the extent practicable. This includes participation in SANDAG and other regional planning forums, reviewing and commenting on planning and environmental documents issued by other agencies, and ongoing collaboration with Native American tribes and adjacent jurisdictions. This inter-agency coordination will help identify any needed adjustments to lighting controls among jurisdictions to maintain dark skies and community character.

The project also includes policies in the Conservation and Open Space Element which would reduce the potential for light or glare impacts. The relevant policies are: COS-13.1, COS-13.2, and COS-13.3. These policies promote the preservation of dark skies that is necessary for local observatories and that contributes to the rural character of a community as well as restrict outdoor lighting and glare from development projects in semi-rural and rural areas. In addition, Policy COS-13.2 requires that development in areas surrounding the Palomar Mountain and Mount Laguna Observatories be designed to maintain dark skies to the maximum extent feasible. As such, adherence to these policies will further reduce impacts associated with light or glare from future development.

**Facts in Support of Finding:** The General Plan Update would have the potential to result in a substantial new source of light or glare from future development that requires night lighting, such as security lighting in commercial areas, or from the use of materials that would result in glare, such as expanses of glass on office buildings. Most of the

General Plan Update land use designations would be consistent with existing conditions, though intensified development would be accommodated in several town centers.

The following measure was also considered to reduce lighting impacts to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

(1) Measure: Expand the Light Pollution Code (County of San Diego Code of Regulatory Ordinances sections 59.101-59.115) Zone A designation to encompass all of the unincorporated areas and create more stringent standards, including, but not limited to:

- Nighttime lighting curfew of 10:00 p.m. for certain areas
- Prohibit development requiring any night lighting within certain areas

Rationale for rejection: This measure would result in restrictions on future development in areas identified for increased growth in the General Plan Update because night lighting is required for safety or other reasons for development accommodated within Zone A areas. The resulting restrictions could pose safety concerns, increase development costs, and in some cases, pose restrictions so great that a particular use may not be possible. Therefore, this measure could conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the project which is to accommodate a reasonable amount of regional growth. This measure could also impede attainment of other objectives such as minimizing public costs of infrastructure and services and reinforcing the vitality and local economy of communities.

None of the project alternatives would reduce impacts associated with lighting or glare to below significant. While the Environmentally Superior Alternative would further reduce lighting and glare impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with light would remain significant and unavoidable.

**Cumulative Impact – Light or Glare:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with increased light. The proposed General Plan Update policies and

mitigation measures would reduce cumulative impacts to nighttime lighting, but not to below a level of significance.

**Facts in Support of Finding:** The construction and operation of cumulative projects located in the San Diego region would have the potential to result in a new source of glare from new development or redevelopment that requires night lighting, such as security lighting in commercial areas, or is constructed with materials that would result in glare, such as expanses of glass on office buildings. Impacts from glare are generally localized and not cumulative in nature; therefore, a significant cumulative impact related to glare would not occur. However, any new sources of nighttime light pollution in the San Diego region would result in a potential lighting impact to the Palomar Mountain and Mount Laguna Observatories. Therefore, the cumulative projects in the region would have the potential to result in a significant cumulative impact associated with nighttime lighting. An additional mitigation measure as described above for project-level impacts was considered but found to be infeasible. Therefore, project impacts associated with light and glare would remain cumulatively considerable.

## ***AGRICULTURAL RESOURCES***

**C-3 Significant Effect – Conversion of Farmland:** The FEIR identifies significant impacts related to the conversion of San Diego County Agricultural Resources (including, but not limited to, Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, pursuant to the FMMP of the California Resources Agency), or other agricultural resources, to non-agricultural use.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impacts as follows:

- Agr-1.1 is the implementation of the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural operations. This measure is a substantial change in allowable uses where agricultural and other natural resources occur. By lowering density in rural areas, the potential conversion of agriculture to development will be considerably reduced.
- Agr-1.2 requires the County to develop and implement programs and regulations that protect agricultural lands, as well as those that support implementation of the Williamson Act. Implementation programs include County CEQA guidelines, Zoning Ordinance, Subdivision Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program. Each of these programs or regulations places limits on allowable impacts to agriculture, thereby substantially reducing the amount of conversion to non-agricultural uses.



- Agr-1.3 requires the County to create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted. This program will provide sufficient area on subdivision project sites to continue agricultural production while still creating new parcels.
- Agr-1.4 requires the County to develop and implement the PACE program which compensates landowners for voluntarily limiting future development on their land. This program will incentivize the placement of agricultural conservation easements on farmland, thereby increasing preservation and reducing conversion of agricultural resources in San Diego County.
- Agr-1.5 is the revision of community plans to identify important agricultural areas, specific compatible uses, and desired buffers necessary to maintain the viability of agriculture in that area. Since community plans are used to review development projects, these revisions will limit future conversion of farmland identified as important for each community.

The project also includes policies in the Land Use and Conservation and Open Space Elements which would reduce the potential for direct conversion of farmland. The relevant policies are: LU-6.4, LU-7.1, LU-7.2, and COS-6.4. These policies will guide development to preserve existing agricultural resources, encourage acquisition and voluntary dedication of conservation easements and programs, and promote the agricultural industry within the County to ensure the long term-viability of agricultural resources. Adherence to these policies will further reduce impacts associated with the direct conversion of agricultural resources from future development.

**Facts in Support of Finding:** Implementation of the proposed General Plan Update could result in the direct conversion of 53,495 acres of agricultural resources to non-agricultural land uses. General Plan Update policies and mitigation measures (described above), have been identified that would reduce these impacts, but not to below a level of significance.

The following measures were considered to reduce impacts associated with the direct conversion of agricultural resources within the unincorporated County to below a level of significance. However, the County has determined that these measures would be infeasible, as described below. Therefore, these measures will not be implemented.

- (1) Measure: Restrict any development of land with densities of 1 du/acre or more, due to potential incompatibilities with agricultural resources.

Rationale for Rejection: This measure would be infeasible because it would result in restrictions on future development in areas identified for increased growth under the proposed General Plan Update. Agricultural operations occur throughout the County unincorporated area. Restricting land use densities of 1 du/acre or more in areas that support agriculture would result in a greater concentration of lower density land uses distributed throughout the unincorporated County and would discourage sustainable growth, an objective of the project. Infrastructure costs, vehicle miles traveled and environmental impacts associated with development would be increased. This mitigation measure would conflict with the project objective of promoting sustainability by locating new development near existing infrastructure, services and jobs and would conflict with the General Plan Update housing goal of supporting a reasonable share of projected regional population growth.

- (2) Measure: Create a land use designation solely for agricultural resources, within which no other land uses would be allowable.

Rationale for Rejection: This measure would be infeasible because it would result in restrictions on future development in areas identified for increased growth under the proposed General Plan Update and/or areas where existing land uses are not the same as the land uses proposed by the General Plan Update. Additionally, many agricultural operations throughout the unincorporated County are unique in that they operate on small lots, located adjacent to a variety of land uses, such as residential. Creating an agriculture-resource-only land use designation would negatively impact many existing County agricultural operations located in non-agricultural land uses. Therefore, this measure would conflict with the project's objective to preserve agriculture as an integral component of the region's economy, character, and open space network.

None of the project alternatives would reduce impacts associated with conversion of farmland to below significant. While the Environmentally Superior Alternative would further reduce these agricultural resource impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with the conversion of farmland would remain significant and unavoidable.

**Cumulative Impact – Conversion of Farmland:** As described above, implementation of the proposed General Plan Update would have the potential to convert San Diego County agricultural resources to non-agricultural use. In combination with other cumulative projects, the project would have a cumulatively considerable contribution to a regionally significant impact to the direct conversion of agricultural land.

**Facts in Support of Finding:** Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to agricultural resources if, in combination, they would convert existing agriculture to non-agricultural uses. A cumulative impact to agricultural resources can occur from adjacent jurisdictions due to placement of incompatible uses near agriculture. The General Plan Update would have a cumulatively considerable contribution to this impact.

General Plan Update policies and mitigation measures would reduce cumulative impacts to agricultural resources, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts associated with the direct conversion of farmland would remain cumulatively considerable.

**C-4 Significant Effect – Indirect Conversion of Farmland:** The FEIR identifies significant impacts involving other changes in the existing environment which, due to their location or nature, could result in conversion of a San Diego County agricultural resource to non-agricultural use.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impacts as follows:

- Agr-1.1 is the implementation of the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural operations. This measure is a substantial change in allowable uses where agricultural and other natural resources occur. By lowering density in rural areas, the potential for indirect conversion of agriculture, through compatibility conflicts between existing agriculture and new development, will be considerably reduced.
- Agr-1.2 requires the County to develop and implement programs and regulations that protect agricultural lands, as well as those that support implementation of the Williamson Act. Implementation programs include County CEQA guidelines, Zoning Ordinance, Subdivision Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program. Each of these programs or regulations places limits on allowable impacts to agriculture, thereby substantially reducing the amount of indirect conversion to non-agricultural uses.

- Agr-1.3 requires the County to create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted. This program will provide sufficient area on subdivision project sites to continue agricultural production while still creating new parcels. Moreover, it will lead to a more cohesive network of agriculture rather than a distribution pattern of development mixed with intense agriculture. This will reduce potential compatibility conflicts and indirect conversion of farmland.
- Agr-1.4 requires the County to develop and implement the PACE program which compensates landowners for voluntarily limiting future development on their land. This program will incentivize the placement of agricultural conservation easements on farmland, thereby increasing preservation and reducing indirect conversion of agricultural resources in San Diego County.
- Agr-1.5 is the revision of community plans to identify important agricultural areas, specific compatible uses, and desired buffers necessary to maintain the viability of agriculture in that area. Community-level planning that identifies important areas for agriculture will minimize potential compatibility conflicts between agriculture and other uses, thereby reducing indirect conversion of farmland.

The project also includes policies in the Land Use and Conservation and Open Space Elements which would reduce the potential for indirect conversion of farmland. The relevant policies are: LU-6.4, LU-7.1, LU-7.2, COS-6.2, COS-6.3, and COS-6.4. These policies minimize indirect conversion of farmland by requiring conservation of agricultural lands and operations, and by limiting conflicts from incompatible uses adjacent to farmland. Adherence to these policies will further minimize impacts associated with indirect conversion of agricultural resources from future development.

**Facts in Support of Finding:** The General Plan Update proposes lower densities in many areas with existing agriculture or prime conditions for future agriculture. However, the project would also redirect high density growth into areas containing agricultural resources, which would potentially cause some indirect conversion of agricultural resources to non-agricultural use because of incompatibility between development accommodated by the General Plan Update and existing agricultural activity. Therefore, this would be considered a potentially significant impact. General Plan Update policies and mitigation measures would reduce impacts, but not to below a level of significance.

The following measure was also considered to reduce impacts associated with indirect conversion of farmland to below significant. However, the County has determined that

this measure would be infeasible, as described below. As such, the following mitigation measure will not be implemented.

- (1) Measure: Within 0.5-mile of any agricultural resource, approve development that is compatible in size and scope with the existing agricultural resource.

Rationale for Rejection: This measure would be infeasible because it would restrict future development in areas identified for increased growth in the General Plan Update. Small farming operations are typical in the County, and many existing and potential agricultural operations are located on small parcels with intermixed surrounding land uses. This measure would restrict certain types of incompatible development in these areas, which would have the potential to conflict with the land uses proposed under the General Plan Update. This measure would also conflict with the project objective of promoting sustainability by locating new development near existing infrastructure, services and jobs because many existing agricultural resources within the unincorporated County are located in areas where existing infrastructure, services and jobs already exist.

None of the project alternatives would reduce impacts associated with indirect conversion of farmland to below significant. While the Environmentally Superior Alternative would further reduce the indirect impacts to agricultural resources, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with the indirect conversion of farmland would remain significant and unavoidable.

**Cumulative Impact – Indirect Conversion of Farmland:** As described above, implementation of the proposed General Plan Update would have the potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of a San Diego County agricultural resource to non-agricultural use. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with indirect conversion of farmland if, in combination, they would create compatibility conflicts that ultimately result in changes from existing agricultural uses to non-agricultural use. Within the San Diego region, the indirect conversion of farmland is increasing due to

population growth and the subsequent development required to support this growth. Land use conflicts often arise from increased agricultural/urban interface areas, high operating costs, and escalating property values. These conflicts have the potential to occur between jurisdictions such as cities, counties, tribal lands, state lands, and federal lands. The project also has the potential to result in an indirect conversion of agricultural resources to non-agricultural uses from conflicts arising from proposed General Plan Update designations. In combination with other cumulative projects such as development projects allowable under surrounding jurisdictions' authority, the project would have a cumulatively considerable contribution to a regionally significant impact to the indirect conversion of agricultural land.

General Plan Update policies and mitigation measures would reduce cumulative impacts associated with indirect conversion of agricultural resources to non-agricultural uses, but not to below a level of significance. An additional mitigation measure as described above for project-level impacts was considered but found to be infeasible. Therefore, project impacts associated with indirect conversion of farmland would remain cumulatively considerable.

## **AIR QUALITY**

**C-5 Significant Effect – Air Quality Violations:** The FEIR identifies significant impacts associated with exceedance of quantitative screening-level thresholds (SLTs) for attainment pollutants (NO<sub>2</sub>, SO<sub>2</sub>, and CO) and exceedance of SLTs for nonattainment pollutants (O<sub>3</sub> precursors and particulate matter).

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impacts as follows (NOTE: the mitigation measures that were applied for Climate Change Impacts, Compliance with AB 32, as discussed under Finding A-37 above are also applicable to this issue of Air Quality Violations and are hereby incorporated by reference):

- Air-2.1 is the provision of incentives such as preferential parking for hybrids or alternatively fueled vehicles. This measure also requires the County to establish programs for priority or free parking on County streets or in County parking lots for hybrids or alternatively fueled vehicles. This would encourage use of low-emission vehicles by increasing the benefits of such use for the public.
- Air-2.2 requires replacement of existing vehicles in the County fleet as needed with the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs. This effort would ensure that on-going County municipal operations result in minimal carbon emissions associated with vehicle usage.
- Air-2.3 is the implementation of transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet. As with Air-2.2, this

measure would ensure County municipal operations result in minimal carbon emissions from vehicle usage.

- Air-2.4 is the provision of incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel cell technologies, renewable energy sources, and hydrogen fuel. By increasing the benefits to using or developing such alternatives, potential impacts from pollutants will be substantially reduced.
- Air-2.5 requires mitigation on all construction projects where emissions are above the SLTs. Requirements may include:
  - Multiple applications of water during grading between dozer/scrapper passes
  - Paving, chip sealing or chemical stabilization of internal roadways after completion of grading
  - Use of sweepers or water trucks to remove “track-out” at any point of public street access
  - Termination of grading if winds exceed 25 miles per hour
  - Stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control
  - Use of low-sulfur fuels in construction equipment
  - Use of low-VOC paints
  - Projects exceeding SLTs will require ten percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NOX), carbon monoxide, and particulate matter. Tier I standards are for engines over 50 hp (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008 (EPA 1998). Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV (EPA 2004).

Application of these types of standards will prevent release of construction-related pollutants, thereby substantially reducing the potential for air quality violations from new development under the General Plan Update.

- Air-2.6 requires the use of County Guidelines for Determining Significance – Air Quality to identify and mitigate adverse environmental effects on air quality. Use of

these guidelines will ensure that discretionary projects under the General Plan Update identify and mitigate significant impacts to air quality.

- Air-2.7 is the implementation of County Air Pollution Control District (APCD) regulations for air emissions from all sources under its jurisdiction. Enforcement of these regulations ensures that development pursuant to the General Plan Update will not violate air quality standards.
- Air-2.8 is the requirement for New Source Reviews to prevent permitting projects that are “major sources.” The purpose of these reviews is to allow continued industrial growth in non-attainment areas and, at the same time, ensure that new and modified sources do not aggravate existing air quality problems and/or negate emissions reductions from other sources.
- Air-2.9 is the implementation of the Grading, Clearing, and Watercourses Ordinance, which requires all clearing and grading to be conducted with dust control measures. These measures minimize particulate matter emissions from construction and prevent nuisance to nearby persons or public or private property. Clearing, grading or improvement plans shall require that measures such as the following be undertaken to achieve this result: watering, application of surfactants, shrouding, control of vehicle speeds, paving of access areas, or other operational or technological measures to reduce dispersion of dust.
- Air-2.10 is the revision of Board Policy F-50 to strengthen the County’s commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary. This will substantially reduce emissions associated with County operations.
- Air-2.11 is the implementation of County Regional Air Quality Strategy (RAQS) to attain State air quality standards for O3. Currently, San Diego County does not meet State and federal health standards for O3.
- Air-2.12 Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy and Environmental Design (LEED) standards or other equivalent Green Building rating systems.
- Air-2.13 Revise Board Policy G-16 to require the County to:
  - Adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability; and
  - Require government contractors to use low emission construction vehicles and equipment.



The project also includes policies in the Conservation and Open Space Element that address air quality violations. The relevant policies are: COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.3, COS-15.4, COS-15.5, COS-16.2, COS-16.3, and COS-20.3. These policies encourage mixed uses and alternative transportation to reduce emissions, reduce land use conflicts that expose people to air pollutants, and apply renewable energy and energy-efficiency practices to future development and to County facilities. Adherence to these policies will further reduce impacts associated with air quality violations from future development.

**Facts in Support of Finding:** The General Plan Update would have the potential to result in a significant impact associated with violation of an air quality standard because emissions of criteria pollutants associated with new residential, commercial, and industrial development under the General Plan Update would exceed the screening-level thresholds for air pollutants. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to air quality violations, but not to below a level of significance.

The following measures were also considered to reduce impacts associated with air quality violations to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- (1) Measure: Require all construction activities to use equipment that is CARB certified Tier 3 or better.

Rationale for Rejection: This measure could not be accomplished because it would require all construction contractors working within the County to turn over their existing equipment which remains usable, and would require a more stringent emissions standard than implemented by CARB. The CARB is in the process of implementing regulations that will require turnover of equipment to meet its regulatory standards starting in 2010 for large vehicle fleets. The measure would limit which construction contractors would be allowed to work within the County and could result in significantly increased costs to project applicants. Therefore, it is infeasible due to legal and economic limitations.

- (2) Measure: Prohibit new development that would result in emissions from new vehicle trips that would exceed the screening level thresholds.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth in the General Plan Update because, with current vehicle emissions standards, it would severely limit development densities. This measure is infeasible because it would conflict with the project's objective to support a reasonable share of projected regional population growth, because it would prohibit new development in the unincorporated County. In

addition, if vehicle trips exceed screening level thresholds but a project is not proposing densities greater than what was expected by the general plan, those trips are accounted for in the RAQS and does not automatically mean the actual ambient air quality standards will be exceeded.

- (3) Measure Prohibit use of architectural coatings or other building materials that may result in emissions of VOCs. Only zero-VOC coatings and building materials would be allowed for use in the County.

Rationale for Rejection: This measure would result in undue hardship on the building industry and would unduly limit development, frustrating the goal of supporting a reasonable share of future population growth because most architectural coatings contain some VOCs and the measure would restrict the types of coatings that could be used to a limited type and number of formulations that may not be feasible for all applications. The VOC content in architectural coatings is regulated by the APCD, which has established a phase-in schedule for reduction of VOCs in accordance with the SIP requirements. The measure would also require the County to monitor and enforce the use of architectural coatings at all construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.

- (4) Measure: Require the construction of new development that would result in a reduction of vehicle trips because developers are able to demonstrate that they tie into an existing or planned alternative transportation network, such as transit (bus, train, trolley), bicycle network, walkways, and trails.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth in the General Plan Update because not all areas of planned growth have an existing or planned alternative transportation network that new development could tie into. Implementation of this mitigation measure would conflict with the project's objective to reinforce the vitality, local economy and individual character of existing communities by restricting future development to areas with existing alternative transportation networks, which excludes many rural areas.

- (5) Measure: Require all applicants to provide on-site renewable energy systems, including solar, wind, geothermal, low-impact hydro power, biomass, and bio-gas.

Rationale for Rejection: This measure would not be feasible for several reasons. All applicants may not be able to provide renewable energy systems at all proposed locations. In addition, some energy systems may trigger additional regulatory requirements from the CPUC or CEC that would make individual projects infeasible to construct. Implementation of this measure would potentially increase infrastructure costs, which would conflict with the project's objective to minimize public costs of infrastructure and services. This measure is therefore infeasible for

economic reasons. However, in circumstances where feasible, applicants will be encouraged to provide on-site renewable energy systems.

- (6) Measure: Install vegetated roofs that cover at least 50 percent of roof area.

Rationale for Rejection: This measure would be infeasible because residential and commercial buyers may find vegetated roofs to be undesirable, and it places the burden of developing the vegetated roof on the project applicant. The measure may also add additional monitoring requirements on the County to verify that vegetated roofs are properly maintained.

- (7) Measure: Provide a spur at nonresidential projects to use nearby rail for goods movement.

Rationale for Rejection: This measure would not be feasible because it would depend on the rail system and the availability of rail transit to individual projects, most of which would not be located near railroad networks. Implementation of this measure would conflict with the project's objective to ensure that development accounts for physical constraints, since much of the unincorporated County has limited access to the existing rail system.

- (8) Measure: Require the use of locally made building materials for construction projects.

Rationale for Rejection: This measure would not be feasible because it would severely limit development projects as some specialized building materials for projects may not be available locally. In addition, the County has neither the legal nor the financial authority to monitor and enforce building material purchases at construction projects within its jurisdiction.

None of the project alternatives would reduce impacts associated with air quality violations to below significant. While the Environmentally Superior Alternative would further reduce the impacts to air quality, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus. Public comment letters, such as the letter from the Attorney General dated August 31, 2009, suggested a City-Urban Centered Alternative that would direct more growth projected for San Diego County to the existing cities to lessen impacts associated with air quality and climate change. This alternative would conflict with the project objective to accommodate a reasonable share of projected regional population growth. Moreover, it would not alleviate the cumulative impact associated with air quality violations discussed below. As such, there are no known feasible alternatives or

mitigation measures that would lessen air quality violation impacts to a level below significant.

**Conclusion:** Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with air quality violations would remain significant and unavoidable.

**Cumulative Impact – Air Quality Violations:** As described above, implementation of the proposed General Plan Update would have the potential to result in a significant violation of an air quality standard. In combination with other cumulative projects, the project would have the potential to result in cumulatively considerable impacts.

**Facts in Support of Finding:** Cumulative projects located in the San Diego region would have the potential to result in a significant cumulative air quality violation if, in combination, they would violate any air quality standard or contribute to an existing or projected air quality violation. New stationary sources of criteria pollutants or projects that would increase vehicle trips may result in increases in pollutant emissions. Cumulative projects in other jurisdictions may not be required to comply with set standards or may have significant unavoidable air quality impacts. The General Plan Update would potentially have a cumulatively considerable contribution to this impact.

General Plan Update policies and mitigation measures would reduce cumulative impacts to air quality violations, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to air quality violations would remain cumulatively considerable.

**C-6 Significant Effect – Non-Attainment Criteria Pollutants:** The FEIR identifies significant impacts related to a cumulatively considerable net increase of any criteria pollutant for which the San Diego Air Basin (SDAB) is non-attainment under applicable federal or State ambient air quality standards (AAQS).

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows (NOTE: the mitigation measures that were applied for Climate Change Impacts, Compliance with AB 32, as discussed under Finding A-37 above are also applicable to this issue of Air Quality Violations and are hereby incorporated by reference):

- Air-2.1 is the provision of incentives such as preferential parking for hybrids or alternatively fueled vehicles. This measure also requires the County to establish programs for priority or free parking on County streets or in County parking lots for

hybrids or alternatively fueled vehicles. This would encourage use of low-emission vehicles by increasing the benefits of such use for the public.

- Air-2.2 requires replacement of existing vehicles in the County fleet as needed with the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs. This effort would ensure that on-going County municipal operations result in minimal carbon emissions associated with vehicle usage.
- Air-2.3 is the implementation of transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet. As with Air-2.2, this measure would ensure County municipal operations result in minimal carbon emissions from vehicle usage.
- Air-2.4 is the provision of incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel cell technologies, renewable energy sources, and hydrogen fuel. By increasing the benefits to using or developing such alternatives, potential impacts from pollutants will be substantially reduced.
- Air-2.5 requires mitigation on all construction projects where emissions are above the SLTs. Requirements may include:
  - Multiple applications of water during grading between dozer/scrapper passes
  - Paving, chip sealing or chemical stabilization of internal roadways after completion of grading
  - Use of sweepers or water trucks to remove “track-out” at any point of public street access
  - Termination of grading if winds exceed 25 miles per hour
  - Stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control
  - Use of low-sulfur fuels in construction equipment
  - Use of low-VOC paints
  - Projects exceeding SLTs will require ten percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NOX), carbon monoxide, and particulate matter. Tier I standards are for engines over 50 hp (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008 (EPA 1998). Tier IV standards apply to

engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV (EPA 2004).

Application of these types of standards will prevent release of construction-related pollutants, thereby substantially reducing the potential for pollutants from new development under the General Plan Update.

- Air-2.6 requires the use of County Guidelines for Determining Significance – Air Quality to identify and mitigate adverse environmental effects on air quality. Use of these guidelines will ensure that discretionary projects under the General Plan Update identify and mitigate significant impacts to air quality.
- Air-2.7 is the implementation of County Air Pollution Control District (APCD) regulations for air emissions from all sources under its jurisdiction. Enforcement of these regulations ensures that development pursuant to the General Plan Update will not violate air quality standards.
- Air-2.8 is the requirement for New Source Reviews to prevent permitting projects that are “major sources.” The purpose of these reviews is to allow continued industrial growth in non-attainment areas and, at the same time, ensure that new and modified sources do not aggravate existing air quality problems and/or negate emissions reductions from other sources.
- Air-2.9 is the implementation of the Grading, Clearing, and Watercourses Ordinance, which requires all clearing and grading to be conducted with dust control measures. These measures minimize particulate matter emissions from construction and prevent nuisance to nearby persons or public or private property. Clearing, grading or improvement plans shall require that measures such as the following be undertaken to achieve this result: watering, application of surfactants, shrouding, control of vehicle speeds, paving of access areas, or other operational or technological measures to reduce dispersion of dust.
- Air-2.10 is the revision of Board Policy F-50 to strengthen the County’s commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary. This will substantially reduce emissions associated with County operations.
- Air-2.11 is the implementation of County Regional Air Quality Strategy (RAQS) to attain State air quality standards for O<sub>3</sub>. Currently, San Diego County does not meet State and federal health standards for O<sub>3</sub>.

- Air-2.12 Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy and Environmental Design (LEED) standards or other equivalent Green Building rating systems.
- Air-2.13 Revise Board Policy G-16 to require the County to:
  - Adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability; and
  - Require government contractors to use low emission construction vehicles and equipment.

The project also includes policies in the Conservation and Open Space Element that address non-attainment criteria pollutants. The relevant policies are: COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.3, COS-15.4, COS-15.5, COS-16.2, COS-16.3, and COS-20.3. These policies encourage mixed uses and alternative transportation to reduce emissions, reduce land use conflicts that expose people to air pollutants, and apply renewable energy and energy-efficiency practices to future development and to County facilities. Adherence to these policies will further reduce impacts associated with non-attainment criteria pollutants from future development.

**Facts in Support of Finding:** Emissions of criteria pollutants associated with future development under the General Plan Update would result in a cumulatively significant impact associated with PM<sub>10</sub> and PM<sub>2.5</sub>, and O<sub>3</sub> precursors under California Ambient Air Quality Standards (CAAQS). Future development under the General Plan Update would be required to comply with the San Diego County Regional Air Quality Strategy (RAQS), the State Implementation Plan (SIP), California Air Resources Board (CARB) motor vehicle standards, Air Pollution Control District (APCD) regulations for stationary sources and architectural coatings, Title 24 energy efficiency standards, and the General Plan Update goals and policies. While existing County policies and regulations and proposed General Plan Update goals and policies are intended to minimize impacts associated with non-attainment criteria pollutants, implementation of the General Plan Update would allow for the development of land uses that would increase County-wide emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. Therefore, the General Plan Update would result in a cumulatively significant impact on air quality. General Plan Update policies and mitigation measures would reduce impacts associated with non-attainment criteria pollutants, but not to below a level of significance.

The following measures were also considered to reduce impacts associated with non-attainment criteria pollutants to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- 
- (1) Measure: Require all construction activities to use equipment that is CARB certified Tier 3 or better.

Rationale for Rejection: This measure could not be accomplished because it would require all construction contractors working within the County to turn over their existing equipment which remains usable, and would require a more stringent emissions standard than implemented by CARB. The CARB is in the process of implementing regulations that will require turnover of equipment to meet its regulatory standards starting in 2010 for large vehicle fleets. The measure would limit which construction contractors would be allowed to work within the County and could result in significantly increased costs to project applicants. Therefore, it is infeasible due to legal and economic limitations.

- (2) Measure: Prohibit new development that would result in emissions from new vehicle trips that would exceed the screening level thresholds.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth in the General Plan Update because, with current vehicle emissions standards, it would severely limit development densities. This measure is infeasible because it would conflict with the project's objective to support a reasonable share of projected regional population growth, because it would prohibit new development in the unincorporated County. In addition, if vehicle trips exceed screening level thresholds but a project is not proposing densities greater than what was expected by the general plan, those trips are accounted for in the RAQS and does not automatically mean the actual ambient air quality standards will be exceeded.

- (3) Measure: Prohibit use of architectural coatings or other building materials that may result in emissions of VOCs. Only zero-VOC coatings and building materials would be allowed for use in the County.

Rationale for Rejection: This measure would result in undue hardship on the building industry and would unduly limit development, frustrating the goal of supporting a reasonable share of future population growth because most architectural coatings contain some VOCs and the measure would restrict the types of coatings that could be used to a limited type and number of formulations that may not be feasible for all applications. The VOC content in architectural coatings is regulated by the APCD, which has established a phase-in schedule for reduction of VOCs in accordance with the SIP requirements. The measure would also require the County to monitor and enforce the use of architectural coatings at all construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.

- (4) Measure: Require the construction of new development that would result in a reduction of vehicle trips because developers are able to demonstrate that they tie



into an existing or planned alternative transportation network, such as transit (bus, train, trolley), bicycle network, walkways, and trails.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth in the General Plan Update because not all areas of planned growth have an existing or planned alternative transportation network that new development could tie into. Implementation of this mitigation measure would conflict with the project's objective to reinforce the vitality, local economy and individual character of existing communities by restricting future development to areas with existing alternative transportation networks, which excludes many rural areas.

- (5) Measure: Require all applicants to provide on-site renewable energy systems, including solar, wind, geothermal, low-impact hydro power, biomass, and bio-gas.

Rationale for Rejection: This measure would not be feasible for several reasons. All applicants may not be able to provide renewable energy systems at all proposed locations. In addition, some energy systems may trigger additional regulatory requirements from the CPUC or CEC that would make individual projects infeasible to construct. Implementation of this measure would potentially increase infrastructure costs, which would conflict with the project's objective to minimize public costs of infrastructure and services. This measure is therefore infeasible for economic reasons. However, in circumstances where feasible, applicants will be encouraged to provide on-site renewable energy systems.

- (6) Measure: Install vegetated roofs that cover at least 50 percent of roof area.

Rationale for Rejection: This measure would be infeasible because residential and commercial buyers may find vegetated roofs to be undesirable, and it places the burden of developing the vegetated roof on the project applicant. The measure may also add additional monitoring requirements on the County to verify that vegetated roofs are properly maintained.

- (7) Measure: Provide a spur at nonresidential projects to use nearby rail for goods movement.

Rationale for Rejection: This measure would not be feasible because it would depend on the rail system and the availability of rail transit to individual projects, most of which would not be located near railroad networks. Implementation of this measure would conflict with the project's objective to ensure that development accounts for physical constraints, since much of the unincorporated County has limited access to the existing rail system.

- (8) Measure: Require the use of locally made building materials for construction projects.

Rationale for Rejection: This measure would not be feasible because it would severely limit development projects as some specialized building materials for projects may not be available locally. The measure would also require the County to monitor and enforce building material purchases at construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.

None of the project alternatives would reduce impacts associated with non-attainment criteria pollutants to below significant. While the Environmentally Superior Alternative would further reduce the impacts to air quality, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus. Public comment letters, such as the letter from the Attorney General dated August 31, 2009, suggested a City-Urban Centered Alternative that would direct more growth projected for San Diego County to the existing cities to lessen impacts associated with air quality and climate change. This alternative would conflict with the project objective to accommodate a reasonable share of projected regional population growth. Moreover, it would not alleviate the cumulative impact associated with non-attainment criteria pollutants discussed below. As such, there are no known feasible alternatives or mitigation measures that would lessen impacts associated with non-attainment criteria pollutants to a level below significant.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with non-attainment criteria pollutants would remain significant and unavoidable.

**Cumulative Impact – Non-Attainment Criteria Pollutants:** As described above, implementation of the proposed General Plan Update would have the potential to result in significant impacts associated with non-attainment criteria pollutants. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Cumulative projects located in the San Diego region would have the potential to result in a significant cumulative impact associated with non-attainment criteria pollutants if, in combination, they would result in a net increase of any criteria pollutant for which the SDAB is non-attainment. The project would result in a potentially significant direct impact associated with non-attainment criteria pollutants. Therefore, the General Plan Update would have a cumulatively considerable contribution to this impact.

General Plan Update policies and mitigation measures would reduce cumulative impacts associated with non-attainment criteria pollutants, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts associated with non-attainment criteria pollutants would remain cumulatively considerable.

**C-7 Significant Effect – Sensitive Receptors:** The FEIR identifies significant impacts to sensitive receptors from exposure to diesel particulate matter.

**Mitigation Measures:** The mitigation measure identified in the FEIR partially mitigates the significant impact as follows:

- Air-4.1 requires the County to use the policies set forth in the CARB's Land Use and Air Quality Handbook (CARB 2005) as a guideline for siting sensitive land uses. Implementation of this measure will ensure that sensitive land uses such as residences, schools, day care centers, playgrounds, and medical facilities are sited appropriately to minimize exposure to emissions of TACs.

**Facts in Support of Finding:** Future development consistent with the General Plan Update would result in potentially significant emissions of diesel particulate matter. Heavy-duty trucks that utilize diesel as a fuel emit diesel particulate matter. Diesel particulate matter from diesel-fueled engines is responsible for most of the airborne cancer risk from TACs in California. Land development projects are required to comply with AB 2588, APCD Rule 1210, and CARB standards for diesel engines. CARB programs designed to reduce emissions, as well as phase-out of older vehicles, would reduce emissions of these pollutants, but not to less than significant levels. Furthermore, growth anticipated by implementation of the General Plan Update would result in the need to develop and expand transportation corridors to allow for the movement of goods within the County; therefore, it is projected that truck trips would increase in the County. General Plan Update mitigation would reduce impacts to associated with sensitive receptors, but not to below a level of significance.

The following measures were also considered to reduce impacts to sensitive receptors to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- (1) Measure: Require that all off-road or non-road diesel engines, such as those associated with construction or extraction operations, be replaced by an alternative power source, such as electricity.

**Rationale for Rejection:** This measure would limit which construction contractors would be allowed to work within the County because not all contractors have

alternative power source equipment available and the measure could result in a significant increase in the costs of development within San Diego County. Limiting the construction contractors allowed to work within the County would conflict with the project's objective to reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment and recreational opportunities. In addition, the County has neither the legal nor the financial authority to monitor and enforce all construction activities within its jurisdiction. In addition, this measure would conflict with CARB's responsibility of regulating emissions from off-road construction equipment.

- (2) Measure: Require all diesel trucks that travel on County roads to be equipped with filters or other devices that would limit diesel emissions to below a significant level.

Rationale for Rejection: This measure is considered to be infeasible because the County cannot monitor all diesel traffic within its jurisdiction due to funding and staffing deficiencies. This would also conflict with CARB's responsibility of regulating emissions from vehicles. Implementing this measure would result in increased public costs, which would conflict with the project's objective to minimize public costs of infrastructure and services.

None of the project alternatives would reduce impacts associated to sensitive receptors from exposure to diesel particulate matter to below significant. While the Environmentally Superior Alternative would further reduce the impacts to sensitive receptors, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to sensitive receptors would remain significant and unavoidable.

**Cumulative Impact – Sensitive Receptors:** As described above, implementation of the proposed General Plan Update would have the potential to significantly impact sensitive receptors due to exposure to diesel particulate matter. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to sensitive receptors if, in combination, they would they would expose sensitive receptors to a substantial concentration of TACs or HAPs that would significantly increase cancer risk.

Cumulatively, projects in the region would have the potential to result in diesel particulate matter from truck trips. In general, construction of cumulative projects would result in a temporary increase in truck trips to haul construction materials to and from the site. In addition, new industrial or commercial developments would have the potential to result in permanent increases in truck trips to an area due to project operation. The General Plan Update would have a cumulatively considerable contribution to this impact.

General Plan Update mitigation would reduce cumulative impacts to sensitive receptors, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to sensitive receptors would remain cumulatively considerable.

## **HAZARDS AND HAZARDOUS MATERIALS**

**C-8 Significant Effect – Wildland Fires:** The FEIR identifies significant impacts associated with exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Haz-4.1 requires the County to identify and minimize potential fire hazards for future development by using and maintaining a database that identifies fire prone areas, locating development away from Fire Hazard areas whenever practicable, and adhering to the County Guidelines for Determining Significance for Wildland Fires & Fire Protection and applying appropriate mitigation when impacts are significant. Implementation of these measures will typically prevent future placement of people and structures near wildland fire hazards.
- Haz-4.2 requires the County to conduct effective and environmentally sensitive brush management measures such as: addressing habitat-specific fire controls within Resource Management Plans; implementation of the Weed Abatement Ordinance and enforcing proper techniques for maintaining defensible space around structures; coordination with the local fire authority having jurisdiction to ensure that district goals for fuel management and fire protection are being met; and recognizing the Memorandum of Understanding between the wildlife agencies and fire authorities that guides the abatement of flammable vegetation without violating environmental regulations for habitat protection. These actions will help minimize fire hazard losses while also avoiding significant impacts to environmental resources.
- Haz-4.3 requires the County to enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. It also includes

implementation of General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas. This effort can substantially reduce potential losses in the event of wildland fire.

- Haz-4.4 requires the County to create a Conservation Subdivision Program that facilitates conservation-oriented, fire-safe, project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. This program is included in the project and will result in subdivision designs with improved fire protection.

The project also includes policies in the Land Use, Safety and Conservation and Open Space Elements that address wildland fire impacts. The relevant policies are: LU-6.11, LU-11.2, S-3.1, S-3.2, S-3.3, S-3.4, S-3.6, S-4.1, and COS-18.3. These policies would direct development away from hazardous wildfire areas as much as possible. For unavoidable development in wildland areas, the policies require that development be located, sited, designed and constructed to enhance defensibility, to minimize the risk of structural loss and life safety resulting from wildland fires, and to be located near available emergency services. Adherence to these policies will further reduce impacts associated with wildland fires.

**Facts in Support of Finding:** In addition to the potential loss of life and property, wildfires may result in the loss or permanent change of natural resources. Although natural conditions make wildfires common in San Diego County, locating high density land uses adjacent to or within a wildland-urban interface can result in increased fire related risk to people and structures. The vast majority of unincorporated San Diego County is ranked as having High or Very High fire hazard severity. Approximately 575,434 acres of the unincorporated County are considered to be within wildland-urban interface areas.

General Plan Update policies and mitigation measures would reduce impacts associated with wildland fires, but not to below a level of significance.

The following measures were also considered to reduce impacts associated with wildland fires to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- (1) Measure: Require development guidelines to be prepared and incorporated into all community plans that would limit the amount of future development in order to reduce hazards associated with wildland fires.

**Rationale for Rejection:** Restrictions on the type or amount of development within a community would conflict with areas identified for increased growth under the

General Plan Update. Therefore, this measure would be infeasible because community plans are required to be consistent with the adopted General Plan. The measure would also conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the project which is to accommodate a reasonable amount of growth.

- (2) Measure: Substantially reduce planned densities in areas of concern.

Rationale for Rejection: This measure would be considered infeasible because the majority of the unincorporated County is located in areas of concern for wildland fires. Implementation of this mitigation measure would result in significant growth restrictions in areas identified for increased growth in the General Plan Update. As such, this measure would conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the project which is to accommodate a reasonable amount of growth.

- (3) Measure: Approve only development that is located in Local Responsibility Areas (LRA) or State Responsibility Areas (SRA) that are considered to have a moderate fire hazard.

Rationale for Rejection: This measure would be considered infeasible because, the majority of the unincorporated County is classified as having a higher than moderate risk for wildland fires under LRA and SRA areas (see Figure 2.7-5). Implementation of this mitigation measure would result in significant growth restrictions in areas identified for increased growth in the General Plan Update. As such, this measure would conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the project which is to accommodate a reasonable amount of growth.

- (4) Measure: Require extensive fuel modification around existing and future development in wildland areas.

Rationale for Rejection: This measure would be infeasible because it would substantially impact the environment by damaging biological resources, altering drainage patterns, causing erosion, and modifying the visual landscape. This would conflict with the objective to protect natural resources and habitat that uniquely define the County's character and ecological importance.

None of the project alternatives would reduce impacts associated with wildland fires to below significant. While the Environmentally Superior Alternative would further reduce the wildfire hazard impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with wildland fires would remain significant and unavoidable.

**Cumulative Impact – Wildland Fires:** As described above, implementation of the proposed General Plan Update would have the potential to result in significant impacts associated with wildland fires. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Southern California has a history of experiencing frequent and intensive wildland fires, which have exposed people and structures to a potentially significant loss of life and property. Some cumulative projects would occur in areas that are considered high or very high fire hazard severity zones. Implementation of the proposed General Plan Update would result in land uses that allow residential, commercial and industrial development in areas that are prone to wildland fires. Implementation of the General Plan Update would result in a potentially significant impact from the exposure of people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands.

General Plan Update policies and mitigation measures would reduce cumulative impacts associated with wildland fires, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts associated with wildland fires would remain cumulatively considerable.

## **HYDROLOGY AND WATER QUALITY**

**C-9 Significant Effect – Water Quality Standards and Requirements:** The FEIR identifies significant impacts that potentially contribute to violation of water quality standards or otherwise degrade water quality.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Hyd-1.1 requires the County to update and implement the County of San Diego's Jurisdictional Urban Runoff Management Program (JURMP). The JURMP ensures the County's compliance with the Municipal Stormwater Permit, thereby minimizing potential violation of standards or degradation of water quality.
- Hyd-1.2 requires the County to implement, and revise as necessary, the Watershed Protection Ordinance. In addition, the County must encourage the removal of



invasive species and restore natural drainage systems. This measure reduces potential adverse effects of polluted runoff discharges on waters.

- Hyd-1.3 requires the County to establish and implement low impact development (LID) standards for new development to minimize runoff and maximize infiltration. This will reduce potential impacts to the quality of surface or groundwater.
- Hyd-1.4 requires the County to implement, and revise as necessary, the Stormwater Standards Manual. This manual requires application of appropriate measures for land use with a high potential to contaminate surface water or groundwater resources. As such, this measure will reduce potential contribution to any violations of water quality standards from land use projects permitted by the County.
- Hyd-1.5 is the utilization of the County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. Application of these guidelines help County staff to identify and mitigate potential water quality impacts associated with public or private projects in the County.
- Hyd-1.6 requires the County to implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available water and sanitation districts. This measure ensures early coordination with utility providers and helps identify water quality standards and regulations that must be met.
- Hyd-1.7 is the County planning staff participation in the review of wastewater facility long range and capital improvement plans. This will reduce potential violation of water quality standards in place or being updated by planning staff and will also allow for identification of land use conflicts that may result in water quality impacts.
- Hyd-1.8 is the requirement for a Major Use Permit when projects propose wastewater facilities. This will ensure that such facilities are adequately sized and that they meet applicable standards and regulations for waste discharge.
- Hyd-1.9 requires the County to review septic system design, construction, and maintenance in cooperation with the Regional Water Quality Control Board (RWQCB) through the Septic Tank Permit Process. This coordination will minimize potential violation of water quality standards or waste discharge requirements since the RWQCB oversees the County's permitting process.
- Hyd-1.10 requires the County to coordinate with the State Water Resources Control Board to develop statewide performance and design standards for conventional and alternative On-site Wastewater Treatment Systems (OWTS). When alternative

OWTS are permitted, this step will help prevent potential conflicts with applicable standards and regulations.

The project also includes policies in the Land Use and Conservation and Open Space Elements that address water quality standards. The relevant policies are: LU-6.5, LU-6.9, LU-14.1, LU-14.2, LU-14.3, LU-14.4, COS-4.2, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.5. These policies will require that future development implement sustainable stormwater management techniques and conform with topography, require coordination with wastewater agencies or districts, require adequate disposal of wastewater, require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency, prohibit sewer facilities that would induce unplanned growth, require drought efficient landscaping for certain use types, and require minimization of impervious surfaces. Adherence to these policies will further reduce impacts associated with water quality standards and waste discharge requirements from future development.

**Facts in Support of Finding:** The development of future land uses as designated in the proposed General Plan Update would contribute pollutants such as sediments, hydrocarbons and paints in quantities that would otherwise significantly degrade surface water quality. It is also anticipated that non-point source pollutants, caused from the development of future land uses as designated in the proposed General Plan Update, would otherwise degrade surface water quality. Additionally, the County General Plan Update Groundwater Study determined that the proposed General Plan Update proposes land uses in groundwater dependent areas that are currently experiencing groundwater contamination. As such, proposed land uses may exacerbate existing groundwater quality impacts. General Plan Update policies and mitigation measures would reduce impacts to water quality standards, but not to below a level of significance.

The following measures were also considered to reduce impacts to water quality standards to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- (1) Measure: Provide a water treatment system that reduces constituents to below the maximum contaminant level (MCL) in all groundwater impaired areas.

Rationale for Rejection: This measure would require treatment plants in many areas of the County, which would potentially result in numerous environmental impacts and conflict with the project objective to minimize public costs and infrastructure.

- (2) Measure: In groundwater quality impaired areas, require water to be imported from other sources.

Rationale for Rejection: This measure would not be feasible based on the extensive infrastructure needed to import water to impaired areas. To provide such infrastructure would conflict with the project objectives to minimize public costs of infrastructure and services and correlate their timing with new development.

- (3) Measure: In groundwater quality impaired areas, place a moratorium on building permits and development applications.

Rationale for Rejection: This measure would be inconsistent with the land use designations proposed for the project. It would also conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the project which is to accommodate a reasonable amount of growth.

None of the project alternatives would reduce impacts associated with water quality standards and requirements to below significant. While the Environmentally Superior Alternative would further reduce water quality impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to water quality standards would remain significant and unavoidable.

**Cumulative Impact – Water Quality Standards and Requirements:** As described above, implementation of the proposed General Plan Update would have the potential to contribute pollutants that affect the quality of surface water or groundwater. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Construction and development associated with cumulative regional land use projects would contribute both point and non-point source pollutants to downstream receiving waters that have the potential to violate water quality standards. For example, projects proposed in Mexico are not subject to water quality discharge requirements and would result in water quality violations in shared watershed management areas. Such projects may result in a potentially significant cumulative impact to water quality standards and requirements.

As discussed above, the project would contribute both non-point and point source pollutants in quantities that have the potential to violate water quality standards. General

Plan Update policies and mitigation measures would reduce cumulative impacts to water quality, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to water quality standards and requirements would remain cumulatively considerable.

**C-10 Significant Effect – Groundwater Supplies and Recharge:** The FEIR identifies significant impacts that would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Hyd-1.1 requires the County to update and implement the County of San Diego's Jurisdictional Urban Runoff Management Program (JURMP). The JURMP ensures the County's compliance with the Municipal Stormwater Permit. This compliance with the permit will minimize impervious surfaces that may interfere with groundwater recharge.
- Hyd-1.2 requires the County to implement, and revise as necessary, the Watershed Protection Ordinance. In addition, the County must encourage the removal of invasive species and restore natural drainage systems. This measure reduces potential impervious area which would interfere with groundwater recharge.
- Hyd-1.3 requires the County to establish and implement low impact development (LID) standards for new development to minimize runoff and maximize infiltration. This will reduce potential impacts to groundwater recharge.
- Hyd-1.4 requires the County to implement, and revise as necessary, the Stormwater Standards Manual. This manual requires application of appropriate measures to facilitate infiltration of stormwater and allow groundwater recharge.
- Hyd-1.5 is the utilization of the County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. Application of these guidelines help County staff to identify and mitigate potential groundwater impacts associated with public or private projects in the County.
- Hyd-2.1 is the implementation, and revision when necessary, of Board Policy I-84 requiring that discretionary project applications include commitments from available water districts. This measure helps reduce unnecessary reliance on groundwater for land use projects. Hyd-2.1 also requires implementation of Board Policy G-15, which directs the conservation of water at County facilities.

- Hyd-2.2 is the implementation of the Groundwater Ordinance to balance groundwater resources with new development. This ordinance minimizes impacts to groundwater supplies from applicable projects. Hyd-2.2 also includes revision of the Ordinance Relating to Water Conservation for Landscaping (currently Zoning Ordinance Sections 6712 through 6725) to further water conservation through the use of recycled water.
- Hyd-2.3 requires the County to establish a water credits program between the County and the Borrego Water District to provide a streamlined and consistent process for the permanent cessation of outdoor water intensive uses such as irrigated agricultural or golf course land. This will help reduce impacts to groundwater supplies in the Borrego community.
- Hyd-2.4 requires the County to coordinate with the San Diego County Water Authority and other water agencies to correlate land use planning with water supply planning and implementation and enhancement of water conservation programs. This cooperation can help minimize adverse effects of future development on water supplies.
- Hyd-2.5 is the implementation, and revision when necessary, of the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains / Floodways to restrict development in flood plains / floodways. Such development could otherwise substantially interfere with groundwater recharge.

The project also includes policies in the Land Use and Conservation and Open Space Elements that address groundwater supplies and recharge. The relevant policies are: LU-8.1, LU-8.2, LU-13.1, LU-13.2, COS-4.1 through COS-4.4, and COS-5.2. These policies require that land use densities relate to groundwater sustainability and resources, facilitate coordination between land use planning and water infrastructure planning, require water-supply commitments for new development, and encourage water conservation and groundwater recharge. Adherence to these policies will further reduce impacts associated with groundwater supply from future development.

**Facts in Support of Finding:** As discussed in the County General Plan Update Groundwater Study, there are multiple areas in the unincorporated County that are currently experiencing groundwater supply impacts. Implementation of the General Plan Update would allow land uses and development to occur in these areas, thereby worsening an already unsustainable groundwater supply. At maximum build-out of land uses proposed in the General Plan Update, groundwater supply impacts would occur in: 1) areas that experience a 50 percent reduction of groundwater in storage; 2) areas that may be currently impacted by the combined drawdown of existing wells; 3) areas that experience a high frequency of low well yield; and 4) Borrego Valley. General Plan Update policies and mitigation measures would reduce potential impacts to groundwater supplies and recharge, but not to below a level of significance.

The following measures were also considered to reduce impacts to groundwater supplies and recharge to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- (1) Measure: In areas with potentially impacted groundwater supplies, require all proposed discretionary projects to share well water through a well sharing agreement.

Rationale for Rejection: This mitigation measure would prove infeasible or enforceable because such agreements would only apply to current developers and would not be binding on existing groundwater uses or future owners of the affected properties. In addition, the County lacks authority and control over groundwater rights.

- (2) Measure: In areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with other groundwater providers to import water through the construction of new infrastructure from another groundwater basin that is not impacted, prior to the issuance of discretionary permits.

Rationale for Rejection: This mitigation measure is considered to be infeasible because piping in groundwater from an off-site source would be a complex and costly process which would involve any number of issues, including: 1) water rights issues; 2) need to obtain proper permits to encroach on public roadways or other private properties to convey the water; 3) potential need to create a new water district/water company; and 4) accelerated deterioration of the groundwater basin that is providing the imported water. Additionally, requiring complex piping to import groundwater from an alternative location has the potential to result in multiple secondary environmental impacts, including growth induction, cultural resources, biological resources, and hydrology/water quality. Although some water districts within the unincorporated County have imported water from another groundwater basin in the past, requiring that all development obtain water contracts, as described above, would result in significant cost increases for developers and water districts. Implementing this mitigation measure would also contradict the proposed General Plan Update objective to promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance because it would result in multiple secondary environmental impacts to both unincorporated County groundwater and surface resources. In addition, this solution may not be sustainable for all projects in the long-term. Implementation of this mitigation measure would also conflict with the project objective to minimize costs of infrastructure and services because this mitigation measure would require extensive infrastructure costs to implement.

- (3) Measure: In groundwater dependent areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with other water providers to truck in water from local water districts or other sources such as an off-site well, prior to the issuance of discretionary permits.

Rationale for Rejection: This mitigation measure is considered to be infeasible because trucked water is not a guaranteed, sustainable, long-term source of water since a water district can rescind or preclude the selling of trucked water in times of drought and limited water supplies. Additionally, implementation of this mitigation measure would conflict with the project objective to maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change because it would require extensive vehicle travel and is not a sustainable solution. Therefore, this would not be a feasible mitigation measure.

- (4) Measure: In groundwater dependent areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with the SDCWA in order to import water from SDCWA facilities.

Rationale for Rejection: This mitigation measure is considered to be infeasible due to the lack of infrastructure in place to convey the water, the limited availability of water within the desert southwest, the cost of providing these services, and the discretionary approval to extend the SDCWA boundary, which is outside of the County's jurisdiction. Implementation of this mitigation measure would also conflict with the project objective to minimize costs of infrastructure and services because the implementation of this mitigation measure would result in extensive infrastructure costs.

- (5) Measure: Implement a Countywide moratorium on building permits and development applications in any areas of the County that would have the potential to adversely impact groundwater supplies and recharge.

Rationale for Rejection: This would effectively result in no new impacts to groundwater supplies and recharge within the unincorporated County. However, due to the size and complexity of the groundwater dependent portion of the County, it is not possible to specifically identify at a parcel-by-parcel scale where significant impacts to groundwater resources would occur. Site-specific groundwater investigations are necessary to provide details of impacts that cannot be provided at the scale in which the General Plan Update Groundwater Study was conducted. Therefore, there is not enough technical evidence in which to impose a moratorium. Additionally, this measure would impede the County's ability to implement the General Plan Update because it would prohibit future development in areas identified for increased growth in the General Plan Update. This mitigation measure would also conflict with the project objective to support a reasonable share of projected regional

population growth. Therefore, for the reasons listed above, this mitigation measure would not be implemented.

None of the project alternatives would reduce impacts associated with groundwater supplies and recharge to below significant. While the Environmentally Superior Alternative would further reduce groundwater impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

**Conclusion:** Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to groundwater supplies and recharge would remain significant and unavoidable.

**Cumulative Impact – Groundwater Supplies and Recharge:** As described above, implementation of the proposed General Plan Update would have the potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Groundwater basins typically serve localized areas and, therefore, any cumulative impacts would generally be localized. The area of cumulative analysis for groundwater supplies and recharge includes the groundwater dependent areas of the unincorporated County and the immediately adjacent jurisdictional areas that share groundwater basins with County areas. As discussed in the Groundwater Study, significant cumulative impacts associated with adjacent jurisdictional projects are not anticipated. However, the impacts to basins evaluated for the General Plan Update are cumulative in nature because they represent the combined influence of numerous past, present, and future users of the groundwater aquifers.

General Plan Update policies and mitigation measures would reduce cumulative impacts to groundwater supplies, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to groundwater supplies and recharge would remain cumulatively considerable.

## ***MINERAL RESOURCES***

**C-11 Significant Effect – Mineral Resource Availability:** The FEIR identifies significant impacts related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.



**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Min-1.1 requires the County to assess the impact of new development on mineral resources as stated in the County Guidelines for Determining Significance for Mineral Resources. It is also required that these guidelines be updated to require evaluation of whether access is being maintained to existing mining sites. This measure will ensure that known mineral resource areas are considered during future planning and development.
- Min-1.2 is the revision of County ordinances to designate areas of known importance for mineral resources as follows:
  - Update the Zoning Ordinance with the addition of a Mining Compatibility Designator or Overlay that identifies parcels with a high potential for mineral resources. The purpose is to take into account the potential mineral resources and that the potential mining use would not be precluded. In addition, specify that notification of potential mining use is provided to all parcels within a 1,500 foot radius of parcels with a Mining Compatibility Designator/Overlay.
  - Revise the Zoning Ordinance to facilitate recycling of salvaged concrete, asphalt, and rock at permitted mining facilities.
  - Revise the Zoning Ordinance and Grading Ordinance to authorize surface mining operations with a Surface Mining Permit rather than a Major Use Permit. Incorporate findings of approval that reflect Mineral Compatibility Designator, SMARA Sections 2762 and 2763, and the inherent nature of surface mining operations. Parcels with a high potential for mineral resources could include those areas designated as MRZ-2 or other areas identified as containing mineral resources that are located where a sufficient buffer is available so that extraction activities are feasible.

Implementation of these changes will allow better protection of known valuable mineral resource areas from incompatible uses.

- Min-1.3 is the request that the State Geologist identify mineral resources in previously unmapped areas of East and North County. The mapping of additional valuable mineral resources zones will provide the County with more opportunity to make areas available for mineral extraction.

The project also includes policies in the Conservation and Open Space Element that address mineral resources. The relevant policies are: COS-10.1 through COS-10.4, COS-10.6, COS-10.8, and COS-10.9. These policies facilitate protection of mineral resource areas from incompatible land uses, require that road access to mining facilities be maintained, and provide for special (less-time consuming) permitting of mining

operations. Adherence to these policies will further reduce impacts associated with mineral resource availability.

**Facts in Support of Finding:** The General Plan Update proposes land uses in areas designated MRZ-2, MRZ-3, or those areas underlain by Quaternary alluvium that would be incompatible with these resources and would result in the loss of availability of known or suspected mineral resources that would be of value to the region and the residents of the State. General Plan Update policies and mitigation measures would reduce impacts to mineral resource availability, but not to below a level of significance.

The following measures were also considered to reduce impacts to mineral resource availability to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- (1) Measure: Prohibit incompatible uses that would be located on or near significant mineral resource sites.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth in the General Plan Update because significant or potentially significant mineral resources sites have been identified throughout the western portion of the unincorporated County, where the majority of development under the General Plan Update would take place. Thus, this measure would conflict with goal of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the project which is to accommodate a reasonable amount of growth.

- (2) Measure: For projects that propose incompatible uses near significant mineral resource sites, require the applicants to mine the site prior to project development.

Rationale for Rejection: This measure would result in significant cost increases and processing timeframes for developers since extraction activities often take decades to complete and may make the site unusable for the proposed land use. In some cases, incompatible land uses may already exist in the vicinity of the mineral resource site that would make extraction at the site infeasible. Moreover, the mandated mineral extraction can cause numerous other site-specific environmental impacts associated with mining that cannot be known at this time. This measure is therefore infeasible for economic reasons as well as because of potential physical and land use constraints.

- (3) Measure: Use public funds to initiate new mineral extraction operations.

Rationale for Rejection: This measure would require voter or Board of Supervisors approval to appropriate funds toward mineral extraction operations, which cannot be

guaranteed. Moreover, this would initiate extraction sites in many areas of the County, which would potentially result in numerous environmental impacts and conflict with the project objective to minimize public costs and infrastructure.

None of the project alternatives would reduce impacts associated with mineral resource availability to below significant. While the Environmentally Superior Alternative would further reduce mineral resource impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

**Conclusion:** Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with mineral resource availability would remain significant and unavoidable.

**Cumulative Impact – Mineral Resource Availability:** As described above, implementation of the proposed General Plan Update would have the potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Construction and operation of cumulative projects in the region would have the potential to result in the loss of availability of known mineral resources. Urbanization and growth in the jurisdictions adjacent to the unincorporated County would have the potential to result in land uses that are incompatible with mining and resource recovery and would result in a cumulative loss of available resources. General Plan Update policies and mitigation measures would reduce cumulative impacts to the availability of known mineral resource areas, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to mineral resource availability would remain cumulatively considerable.

**C-12 Significant Effect – Mineral Resource Recovery Sites:** The FEIR identifies significant impacts related to the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Min-1.1 requires the County to assess the impact of new development on mineral resources as stated in the County Guidelines for Determining Significance for

Mineral Resources. It is also required that these guidelines be updated to require evaluation of whether access is being maintained to existing mining sites. This measure will ensure that known mineral resource recovery sites are considered during future planning and development.

- Min-1.2 is the revision of County ordinances to designate areas of known importance for mineral resources as follows:
  - Update the Zoning Ordinance with the addition of a Mining Compatibility Designator or Overlay that identifies parcels with a high potential for mineral resources. The purpose is to take into account the potential mineral resources and that the potential mining use would not be precluded. In addition, specify that notification of potential mining use is provided to all parcels within a 1,500 foot radius of parcels with a Mining Compatibility Designator/Overlay.
  - Revise the Zoning Ordinance to facilitate recycling of salvaged concrete, asphalt, and rock at permitted mining facilities.
  - Revise the Zoning Ordinance and Grading Ordinance to authorize surface mining operations with a Surface Mining Permit rather than a Major Use Permit. Incorporate findings of approval that reflect Mineral Compatibility Designator, SMARA Sections 2762 and 2763, and the inherent nature of surface mining operations. Parcels with a high potential for mineral resources could include those areas designated as MRZ-2 or other areas identified as containing mineral resources that are located where a sufficient buffer is available so that extraction activities are feasible.

Implementation of these changes will allow better protection of known mineral resource recovery sites from incompatible uses.

- Min-1.3 is the request that the State Geologist identify mineral resources in previously unmapped areas of East and North County. The mapping of additional valuable mineral resources zones will provide the County with more opportunity to make areas available for mineral extraction.

The project also includes policies in the Conservation and Open Space Element that address mineral resources. The relevant policies are: COS-10.1 through COS-10.4, COS-10.6, COS-10.8, and COS-10.9. These policies facilitate protection of mineral resource areas from incompatible land uses, require that road access to mining facilities be maintained, and provide for special (less-time consuming) permitting of mining operations. Adherence to these policies will further reduce impacts associated with mineral resource recovery sites from future development.

**Facts in Support of Finding:** The General Plan Update proposes potentially incompatible land uses that would have the potential to encroach on areas where mines are active or where future resource recovery sites would have otherwise been permitted.

General Plan Update policies and mitigation measures would reduce impacts to mineral resource recovery sites, but not to below a level of significance.

The following measures were also considered to reduce impacts to mineral resource recovery sites to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- (1) Measure: Prohibit incompatible uses that would be located on or near significant mineral resource sites.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth in the General Plan Update because significant or potentially significant mineral resources sites have been identified throughout the western portion of the unincorporated County, where the majority of development under the General Plan Update would take place. Thus, this measure would conflict with goal of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the project which is to accommodate a reasonable amount of growth.

- (2) Measure: For projects that propose incompatible uses near significant mineral resource sites, require the applicants to mine the site prior to project development.

This measure would result in significant cost increases and processing timeframes for developers since extraction activities often take decades to complete and may make the site unusable for the proposed land use. In some cases, incompatible land uses may already exist in the vicinity of the mineral resource site that would make extraction at the site infeasible. Moreover, the mandated mineral extraction can cause numerous other site-specific environmental impacts associated with mining that cannot be known at this time. This measure is therefore infeasible for economic reasons as well as because of potential physical and land use constraints.

- (3) Measure: Use public funds to initiate new mineral extraction operations.

Rationale for Rejection: This measure would require voter or Board of Supervisors approval to appropriate funds toward mineral extraction operations, which cannot be guaranteed. Moreover, this would initiate extraction sites in many areas of the County, which would potentially result in numerous environmental impacts and conflict with the project objective to minimize public costs and infrastructure.

None of the project alternatives would reduce impacts associated with mineral resource recovery sites to below significant. While the Environmentally Superior Alternative would further reduce mineral resource impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting

the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

**Conclusion:** Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to mineral resource recovery sites would remain significant and unavoidable.

**Cumulative Impact – Mineral Resource Recovery Sites:** As described above, implementation of the proposed General Plan Update would have the potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Urbanization and growth in the jurisdictions adjacent to the unincorporated County would have the potential to result in land uses that are incompatible with mineral resource recovery. Projected growth in the region would result in a reasonably foreseeable loss of mineral resource recovery sites due to the encroachment of incompatible uses that would preclude the extraction of mineral resources. General Plan Update policies and mitigation measures would reduce cumulative impacts to mineral resource recovery sites, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to mineral resource recovery sites would remain cumulatively considerable.

## **NOISE**

**C-13 Significant Effect – Permanent Increase in Ambient Noise Levels:** The FEIR identifies significant impacts associated with the substantial permanent increase in ambient noise which would exceed the sound level limits specified in San Diego County Code Section 36.404, Sound Level Limits, at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Noi-1.3 requires that an acoustical study be done for projects proposing amendments to the County General Plan Land Use Element and/or Mobility Element when a significant increase to the average daily traffic is proposed compared to traffic anticipated in the General Plan. This measure will prevent unanticipated noise level increases for sensitive land uses.

- Noi-1.4 is the revision of the Guidelines for Determining Significance - Noise standard mitigation and project design considerations to promote traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise. These types of project features will help minimize potential noise impacts on sensitive land uses.
- Noi-1.5 requires coordination with Caltrans and SANDAG as appropriate to identify and analyze appropriate route alternatives that may minimize noise impacts to noise sensitive land uses within the unincorporated areas of San Diego County.
- Noi-1.8 is the implementation of procedures (or cooperative agreements) with Caltrans, the City of San Diego, and other jurisdictions as appropriate to ensure that a public participation process or forum is available for the affected community to participate and discuss issues regarding transportation generated noise impacts for new or expanded roadway projects that may affect noise sensitive land uses within the unincorporated areas of San Diego County.
- Noi-2.3 requires that industrial facility projects be reviewed to ensure they are located in areas that would minimize impacts to noise-sensitive land uses. It further requires revisions to the County of San Diego Guidelines for Determining Significance - Noise to incorporate appropriate noise attenuation measures for minimizing industrial-related noise. This will reduce direct and cumulative increases in ambient noise levels.
- Noi-2.4 requires that an acoustical study accompany extractive mining projects that may affect noise-sensitive land uses. Similarly, it requires an acoustical study for noise-sensitive land use projects proposed near existing extractive land use facilities. The results of the acoustical study may require a “buffer zone” or other mitigating features to reduce impacts the impacts of increased noise levels on sensitive receptors.
- Noi-3.1 requires that for new County road improvement projects, either the County’s Noise Standards are used to evaluate noise impacts or the project does not exceed 3 decibels over existing noise levels. This measure will help to minimize and direct and cumulative noise level increases associated with County road improvements.
- Noi-3.2 requires the County to work with the project applicant during the review of either the building permit or discretionary action (whichever is applicable) to determine appropriate noise reduction site design techniques that include:
  - Orientation of loading/unloading docks away from noise sensitive land uses
  - Setbacks or buffers to separate noise generating activities from noise sensitive land uses

- Design on-site ingress and egress access away from noise sensitive land uses

These measures will help minimize permanent increases in ambient noise from future development under the General Plan Update.

The project also includes policies in the Land Use and Noise Elements that address noise impacts. The relevant policies are: LU-2.8, M-1.3, M-2.4, N-1.5, N-4.1, N-4.2, N-4.6, N-5.1, and N-5.2. These policies reduce the potential for increases in average daily traffic to increase cumulative traffic noise to noise-sensitive land uses; apply traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise; require proposed projects to be evaluated against ambient noise levels to determine whether the project would increase ambient noise levels by more than three decibels; require development to be designed so that automobile and truck access to industrial and commercial properties abutting residential properties is located at the maximum practical distance from residential zones, encourage noise-generating industrial facilities to be located at the maximum practical distance from residential zones; require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise; and require plans for high-volume roadways to consider noise-sensitive receptors in location and design. Adherence to these policies will further reduce impacts associated with permanent increases in ambient noise levels.

**Facts in Support of Finding:** Traffic on new roadways or roadway improvements, as well as operation of new industrial facilities and other noise-generating uses under the General Plan Update would result in potentially significant permanent increases in ambient noise level. General Plan Update policies and mitigation measures would reduce impacts to associated with the permanent increase of ambient noise levels, but not to below a level of significance.

The following measure was also considered to reduce impacts associated with the permanent increase of ambient noise levels to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- (1) Measure: Prohibit new roadways or roadway improvements that would result in a significant increase in the ambient noise level.

**Rationale for Rejection:** The measure would prohibit the construction of many roadway projects proposed in the Mobility Element because they would result in increases in ambient noise. This measure is infeasible because it would restrict future development in areas identified for increased growth under the General Plan Update because new roadways to serve this growth would not be constructed. Additionally, this mitigation measure would conflict with the project objective to provide and support a multi-modal transportation network that enhances connectivity



and supports community development patterns because it would prohibit the development of new roadways.

None of the project alternatives would reduce impacts associated with the permanent increase in ambient noise levels to below significant. While the Environmentally Superior Alternative would further reduce noise impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

**Conclusion:** Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with the permanent increase in ambient noise levels would remain significant and unavoidable.

**Cumulative Impact – Permanent Increase in Ambient Noise Levels:** As described above, implementation of the proposed General Plan Update would have the potential to result in a substantial permanent increase in ambient noise which would exceed the sound level limits specified in San Diego County Code Section 36.404 at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** A cumulative noise impact would occur if construction and development associated with cumulative regional land use projects, such as those identified in adjacent jurisdictions and regional transportation plans, when combined would result in an increase in ambient noise that would exceed the County's noise standards. For example, future casino development on tribal lands could result in an increase in ambient noise due to increases in traffic on local roads associated with vehicles and passenger buses that transport customers to and from casinos. General Plan Update policies and mitigation measures would reduce cumulative impacts associated with the permanent increase of ambient noise levels, but not to below a level of significance. An additional mitigation measure as described above for project-level impacts was considered but found to be infeasible. Therefore, project impacts associated with the permanent increase of ambient noise levels would remain cumulatively considerable.

## ***TRANSPORTATION AND TRAFFIC***

**C-14 Significant Effect – Unincorporated County Traffic and Level of Service Standards:**  
The FEIR identifies significant impacts related to (a) an increase in traffic which is

substantial in relation to the existing traffic load and capacity of the street system; and (b) exceedance, either individually or cumulatively, of a level of service standard established by the County Congestion Management Agency for designated roads or highways.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Tra-1.1 requires the County to coordinate with SANDAG and adjacent cities during updates to the Regional Transportation Plan (RTP) to identify a transportation network that maximizes efficiency, enhances connectivity between different modes of travel, and minimizes impacts when locating new freeways and State highways. This coordination can help prevent future exceedance of LOS standards on Mobility Element roads in the County and mitigate potential traffic increases.
- Tra-1.2 requires the County to coordinate with Caltrans and adjacent jurisdictions during planning and design for improvements to the freeway and State highway network. This coordination can help prevent future exceedance of LOS standards on Mobility Element roads in the County and mitigate potential traffic increases.
- Tra-1.3 is the implementation of County Public Road Standards during review of new development projects. Tra-1.3 also includes revision of the Public Road Standards to include a range of road types according to Regional Category context. Application of this measure will ensure that LOS standards are met when feasible and that appropriate road types are assigned based the specifics of the development.
- Tra-1.4 is the implementation, and revision as necessary, of the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This measure will ensure that appropriate site design and mitigating measures are applied to minimize traffic increases and road deficiencies associated with future development under the General Plan Update.
- Tra-1.5 is the implementation of the Congestion Management Strategies identified in the Regional Transportation Plan. Tra-1.5 also requires that large projects processed through the County mitigate impacts to State highways and freeways. This effort will reduce potential cumulative traffic increases in the County.
- Tra-1.6 requires the County to develop project review procedures to require large commercial and office development to use Transportation Demand Management Programs to reduce single-occupant vehicle traffic generation and to prepare and forward annual reports to the County on the effectiveness of the program. This measure will reduce potential traffic increases in the County associated with commercial and office development under the General Plan Update.

- Tra-1.7 is the implementation of the San Diego County Transportation Impact Fee (TIF) Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development. This measure will help reduce financial barriers associated with accommodating increased traffic and/or meeting LOS standards.

The project also includes policies in the Land Use and Mobility Elements that address traffic and LOS standards. The relevant policies are: LU-5.1, LU-10.4, LU-11.8, LU-12.2, M-1.1, M-1.2, M-1.3, M-2.1, M-2.2, M-2.3, M-3.1, M-3.2, M-4.2, M-5.1, M-5.2, M-9.1, and M-9.2. These policies promote the reduction of vehicle trips, limit high-traffic uses in rural and semi-rural areas, encourage uses that would reduce the frequency of employee vehicle trips, require development to mitigate the significant impacts to existing service levels of public facilities, provide for an interconnected road network, encourage alternative transportation, establish LOS criteria, and apply appropriate road standards to future development. Adherence to these policies will further reduce impacts associated with County traffic and LOS standards from future development.

**Facts in Support of Finding:** Implementation of the proposed General Plan Update would result in a total of 76 deficient roadway segments throughout the unincorporated County. The 76 deficient roadway segments would result in a total of 133.1 deficient lane miles since roadway segments often consist of multiple lanes. Therefore, although it is an improvement over existing conditions, a total of 133.1 roadway lane miles are forecast to exceed the Level of Service (LOS) standard established by the County. General Plan Update policies and mitigation measures would reduce impacts to County traffic and LOS standards, but not to below a level of significance.

State law requires jurisdictions to develop a circulation (mobility) network that correlates with the land uses proposed in the General Plan. Therefore, a lower LOS should be accepted only in special circumstances. Additional measures were also included to reduce impacts to County traffic to below significant. A primary measure established to further reduce the amount of deficient roadway segments included new road classifications (Community Collector with Improvement Options and Light Collector with Improvement Options) that would require the reservation of sufficient right-of-way to construct intersection improvements, such as right turn lanes, to mitigate traffic impacts. However, while these improvements would improve traffic flow, they are not reflected in the General Plan Update traffic model, which still forecasts these roads to operate at LOS E or F.

Additional measures were also considered to reduce impacts to County traffic and LOS standards to below significant. The majority of measures that were considered in attempting to further reduce the amount of deficient roadway segments included identifying new or expanded road segments to mitigate other projected failing segments. However, based on criteria developed in the General Plan Update, these measures were rejected as infeasible.

The County standard for the LOS on Mobility Element roads is LOS D. An objective of the General Plan Update is to plan for growth while preserving the County's environmental, cultural, and historical resources. The recommended road network balances the benefits of an acceptable LOS with constraints that limit the County's ability to provide improvements. In some cases, the constraints are so substantial that they render future road widening infeasible or impractical. To address such cases, the County established the following LOS E/F criteria to define the conditions where a failing LOS is acceptable because mitigation to fully reduce the impact would be infeasible for one or more of the reasons described in the following sections. Appendix F within Volume IV of the FEIR provides a detailed table identifying the deficient roadways and describing the rationale for accepting deficient roadway segments.

#### Substantial Constraints Affecting New or Expanded Road Construction:

- Environmental Impacts – Construction of some roads would significantly impact important habitats, destroy archaeological sites, impact waterways, or require the demolition of historic landmarks. The preservation of valuable resources may outweigh the benefits of road improvements. Thus, a lower LOS may be acceptable as a tradeoff for avoiding environmental impacts. In addition, the effort to avoid or mitigate undesired impacts may have a major effect on construction costs.
- Established Land Development – Existing businesses, historic buildings, established neighborhoods, and a pedestrian-friendly environment are essential components of a healthy town center. Road improvements that negatively affect these components can be undesirable. Wider roads may divide a town and change its character. Costs to widen a road are substantially increased by the acquisition of right-of-way and the relocation of existing land uses. If costly construction or widening of roads substantially disrupts the vitality of a town center, a lower LOS may be preferable. In some instances, road improvements may also increase dangers to pedestrians, in which case a lower LOS may be preferable.

#### Conditions Under Which a Road May be Exempted from County LOS Standards:

- Town Centers – Town centers further a number of project objectives such as improving housing affordability, accommodating growth, and helping to define the character of a community. Therefore, the road may be exempted from County LOS standards when widening the road would obstruct pedestrian movements, impede the economic vitality of existing/planned businesses, require the demolition of historic structures, or negatively alter the overall character of the area.
- Marginal Deficiencies – Exempting a road from County LOS standards may be the more preferable choice when a road failure results from only a marginal deficiency in performance. Traffic congestion on a small portion of a road may produce a failing LOS for only that short segment while the remainder of the road is acceptable. Due

to the short segment length, overall delays may be small in comparison to the travel time along the length of the entire road corridor. In many cases, operational improvements such as synchronized signals and additional turn lanes can alleviate the problem and are more cost effective than adding new travel lanes. Some failing roads are projected to carry a traffic volume that is not significantly higher than the acceptable threshold (LOS D). If the projected volume is not anticipated to affect overall traffic operation, planning for a wider road to accommodate the additional traffic may not be required. Acceptance of a lower LOS is particularly appropriate when underutilized, alternate routes are available.

- **Environmental Constraints** – Major physical and environmental constraints can severely hinder construction of needed improvements for some failing roads. The proposed General Plan Update policies seek to minimize environmental impacts and minimize road construction costs. In addition, the planned road network must be consistent with the County's Multiple Species Conservation Plan. The nature of the constraints, the impact of needed improvements, potential effects on sensitive habitat/species, the availability of alternate routes, the cost of construction, and the need for better traffic circulation are carefully considered by staff before making a recommendation to accept a failing LOS.

None of the project alternatives would reduce impacts associated with County traffic and level of service standards to below significant. While the Environmentally Superior Alternative would further reduce traffic impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without new or expanded road and/or intersection construction as described above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

**Conclusion:** Because new or expanded road and/or intersection construction on the 76 deficient roadway segments would be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with County traffic and level of service standards would remain significant and unavoidable.

#### **Cumulative Impact – Unincorporated County Traffic and Level of Service**

**Standards:** As described above, implementation of the proposed General Plan Update would have the potential to result in an increase in traffic and exceedance of Level of Service (LOS) standard. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Cumulative projects would result in additional LOS E roadway segments and this would be considered a significant cumulative impact. The General Plan Update is projected to result in 48.4 total roadway lane miles at LOS E and

84.7 total roadway lane miles at LOS F. Therefore, the project would result in a cumulatively considerable contribution to a significant cumulative traffic impact.

Under the cumulative traffic scenario, 11 State highways and 65 Mobility Element roads would operate at a deficient LOS. This would be considered a significant cumulative impact. The proposed General Plan Update would result in a total of 76 deficient roadway segments. Therefore, the project would result in a cumulatively considerable contribution to a significant cumulative traffic impact.

General Plan Update policies and mitigation measures would reduce cumulative impacts to traffic, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to County traffic and LOS standards would remain cumulatively considerable.

**C-15 Significant Effect – Adjacent Jurisdictions Traffic and Level of Service Standards:**

The FEIR identifies significant impacts related to (a) an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system; and (b) exceedance, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Tra-1.1 requires the County to coordinate with SANDAG and adjacent cities during updates to the Regional Transportation Plan (RTP) to identify a transportation network that maximizes efficiency, enhances connectivity between different modes of travel, and minimizes impacts when locating new freeways and State highways. This coordination can help prevent future exceedance of LOS standards in adjacent cities and mitigate potential traffic increases.
- Tra-1.2 requires the County to coordinate with Caltrans and adjacent jurisdictions during planning and design for improvements to the freeway and State highway network. This coordination can help prevent future exceedance of LOS standards in adjacent cities and mitigate potential traffic increases.
- Tra-1.3 is the implementation of County Public Road Standards during review of new development projects. Tra-1.3 also includes revision of the Public Road Standards to include a range of road types according to Regional Category context. Application of this measure will ensure that LOS standards are met for adjacent jurisdictions when feasible.

- Tra-1.4 is the implementation, and revision as necessary, of the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This measure will ensure that appropriate site design and mitigating measures are applied to minimize traffic increases and road deficiencies in adjacent jurisdictions.
- Tra-1.5 is the implementation of the Congestion Management Strategies identified in the Regional Transportation Plan. Tra-1.5 also requires that large projects processed through the County mitigate impacts to State highways and freeways. This effort will reduce potential cumulative traffic increases in adjacent jurisdictions.
- Tra-1.7 requires the County to develop project review procedures to require large commercial and office development to use Transportation Demand Management Programs to reduce single-occupant vehicle traffic generation and to prepare and forward annual reports to the County on the effectiveness of the program. This measure will reduce potential traffic increases in adjacent jurisdictions associated with commercial and office development under the General Plan Update.
- Tra-2.1 requires the County to establish coordination efforts with other jurisdictions when development projects will result in a significant impact on city roads. When available, the County shall use the applicable jurisdiction's significance thresholds and recommended mitigation measures to evaluate and mitigate impacts. This measure will help identify and alleviate potential increases to traffic in adjacent cities from future development under the General Plan Update.

The project also includes policies in the Land Use and Mobility Elements that address traffic and LOS standards affecting adjacent jurisdictions. The relevant policies are: LU-5.1, LU-10.4, LU-11.8, LU-12.2, M-1.1, M-1.2, M-1.3, M-2.1, M-2.2, M-2.3, M-3.1, M-3.2, M-4.2, M-4.3, M-4.6, M-5.1, M-5.2, M-9.1, and M-9.2. These policies promote the reduction of vehicle trips, limit high-traffic uses in rural and semi-rural areas, encourage uses that would reduce the frequency of employee vehicle trips, require development to mitigate the significant impacts to existing service levels of public facilities, provide for an interconnected road network, encourage alternative transportation, establish LOS criteria, and apply appropriate road standards to future development. In addition, Policies M-4.3 and M-4.6 require coordination with neighboring agencies to plan and maintain transportation facilities. Adherence to these policies will further reduce impacts associated with adjacent jurisdictions traffic and LOS standards.

**Facts in Support of Finding:** When compared to existing conditions, implementation of the proposed General Plan Update would result in roadway segments in adjacent cities that would exceed the LOS standard established by the respective city. General Plan Update policies and mitigation measures would reduce impacts to adjacent jurisdictions traffic and LOS standards, but not to below a level of significance.

Additional measures were also considered to reduce impacts to adjacent jurisdictions traffic and LOS standards to below significant. Mitigation measures, such as requiring that all significantly impacted roadway segments undergo construction or expansion in order to increase the roadway LOS level, would have the potential to minimize significant impacts to adjacent cities. Although not always the case, mitigation measures to improve adjacent jurisdictions roadways are generally considered infeasible because such improvements are outside the jurisdiction of the County. In some cases, such roadway improvements would be consistent with the plans of the affected cities. However, in many cases they have not been planned, either because the city does not desire that the road be improved or the plans have not yet been updated to reflect the level of future growth included in this analysis. In cases where a city desires that the impacts be mitigated, the County would coordinate with the city when significant traffic impacts to roads in adjacent cities are attributed to specific projects being processed in the County. These projects would be required to undertake mitigation, such as a fair share contribution, pursuant to city direction. Without significant reductions in the overall growth of the County, impacts to County traffic and LOS standards would remain significant and unavoidable.

None of the project alternatives would reduce impacts associated with adjacent jurisdictions traffic and level of service standards to below significant. While the Environmentally Superior Alternative would further reduce traffic impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

**Conclusion:** Because the extent of roadway construction or expansions required to mitigate level of service impacts have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with adjacent jurisdictions traffic and level of service standards would remain significant and unavoidable.

### **Cumulative Impact – Adjacent Jurisdictions Traffic and Level of Service**

**Standards:** As described above, implementation of the proposed General Plan Update would have the potential to result in an increase in traffic and exceedance of Level of Service (LOS) standard in adjacent jurisdictions. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Cumulative projects, such as those proposed in the general plans of surrounding jurisdictions, when combined would significantly impact a number of roadway segments. Cities that would experience impacted roadway segments under cumulative conditions include: City of San Diego, Poway, Chula Vista, San Marcos, Escondido, Santee, El Cajon, Solana Beach and Vista. Additionally, the proposed General Plan Update is projected to result in adjacent city roadway segments



being significantly impacted upon build-out. General Plan Update policies and mitigation measures would reduce cumulative impacts to adjacent jurisdictions traffic and LOS standards, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to adjacent jurisdictions traffic and LOS standards would remain cumulatively considerable.

**C-16 Significant Effect – Rural Road Safety:** The FEIR identifies significant impacts related to substantial increases in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Tra-1.3 is the implementation of County Public Road Standards during review of new development projects. Tra-1.3 also includes revision of the Public Road Standards to include a range of road types according to Regional Category context. Application of this measure will ensure that future public roads meet current safety standards.
- Tra-1.4 is the implementation, and revision as necessary, of the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This measure will ensure that appropriate site design and mitigating measures are applied to prevent road hazards associated with future development.
- Tra-1.7 requires the County to develop project review procedures to require large commercial and office development to use Transportation Demand Management Programs to reduce single-occupant vehicle traffic generation and to prepare and forward annual reports to the County on the effectiveness of the program. This measure will reduce potential rural road hazards from features or incompatible uses associated with commercial and office development under the General Plan Update.
- Tra-3.1 requires coordination with SANDAG to obtain funding for operational improvements to State highways and freeways in the unincorporated area. This will reduce potential incompatibility of alternative transportation facilities with roadway and highway facilities, thereby improving safety for pedestrians and bicyclists.

The project also includes policies in the Land Use and Mobility Elements that address rural road safety. The relevant policies are: LU-2.8, LU-6.9, M-4.3, M-4.4, M-4.5, and M-9.1. These policies help minimize adverse effects that are detrimental to human health and safety, help to protect people and property from natural and man-induced hazards, require that roads have safe and adequate emergency access, and encourage operational improvements that increase the effective vehicular capacity of the public

road network. Adherence to these policies will further reduce impacts associated with rural road safety from future development.

**Facts in Support of Finding:** Implementation of the proposed General Plan would result in the adoption of a Mobility Element network that includes existing roadways with horizontal and vertical curves that are sharper than existing standards. This would be considered a potential transportation hazard. Additionally, the proposed General Plan Update may pose an increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns. Implementation of the proposed General Plan Update would also have the potential to result in hazards from at-grade rail crossings. General Plan Update policies and mitigation measures would reduce impacts to rural road safety, but not to below a level of significance.

The following measures were also considered to reduce impacts to rural road safety to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- (1) Measure: Require all roadway facilities with horizontal and vertical curves that are sharper than existing standards to undergo construction improvements so that facilities would be compliant with existing safety standards.

Rationale for Rejection: This measure would be considered infeasible due to related construction improvement costs and the fact that while some roadways may not be compliant with existing safety standards, they may be operating at acceptable LOS standards. In addition, some of the transportation facilities in the unincorporated County are within the jurisdiction of another agency, such as Caltrans. Additionally, implementation of this measure would require construction improvements to many roadways in the unincorporated backcountry area, where the majority of development would not be located under implementation of the proposed General Plan Update. Therefore, this mitigation measure would conflict with the project's objective to provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.

- (2) Measure: All transportation facilities within the unincorporated County shall be retrofitted to provide safe bicycle and pedestrian movement corridors.

Rationale for Rejection: This measure would conflict with the project's objective to minimize public costs of infrastructure and services and correlate their timing with development. Additionally, this measure would be considered infeasible due to related construction improvement costs and the fact that improvements required by this mitigation measure may reduce the existing and future service level standards of the facilities. In addition, some of the transportation facilities in the unincorporated County are within the jurisdiction of another agency, such as Caltrans.

None of the project alternatives would reduce impacts associated with rural road safety to below significant. While the Environmentally Superior Alternative would further reduce rural road safety impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with rural road safety would remain significant and unavoidable.

**Cumulative Impact – Rural Road Safety:** As described above, implementation of the proposed General Plan Update would have the potential to result in substantial increases in hazards due to a design feature or incompatible uses. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** The area of analysis for cumulative transportation operation includes the County of San Diego and immediately surrounding jurisdictions. Cumulative projects in these areas include projects consistent with surrounding jurisdictions' general plans and regional roadway plans such as the SANDAG RTP and SCAG RTP. Cumulative projects in surrounding jurisdictions would face similar potential transportation operational issues as those in the unincorporated County. Older roadways in incorporated jurisdictions that surround the County would not be adequate by existing roadway standards. Additionally, many unincorporated areas that surround the County, including areas within the Counties of Riverside and Imperial have rural roadway conditions similar to the unincorporated County. Therefore, cumulative projects in these areas would face the same traffic operational concerns including: roadway networks that include existing roadways with horizontal and vertical curves sharper than existing standards; increased traffic on rural roads with slow moving agricultural vehicles; increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns; or hazards from at-grade rail crossings. While cumulative projects would not preclude improvements to roadways with potential hazards, there is no guarantee that these improvements would be constructed concurrently with the anticipated increase in vehicle trips on these roadways. General Plan Update policies and mitigation measures would reduce cumulative impacts to rural road safety, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to rural road safety would remain cumulatively considerable.

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**UTILITIES AND SERVICE SYSTEMS**

**C-17 Significant Effect – Adequate Water Supplies:** The FEIR identifies significant impacts related to (1) a demand for water that exceeds existing entitlements and resources, or necessitates new or expanded entitlements; and (2) substantial depletion of groundwater supplies or interference with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- USS-4.1 requires the County to review General Plan Amendments (GPAs) for consistency with the goals and policies of the General Plan. This shall include designating groundwater dependent areas with land use density/intensity that is consistent with the long-term sustainability of groundwater supplies; locating commercial, office, civic, and industrial development in villages, town centers or at transit nodes; and ensuring that adequate water supply is available for development projects that rely on imported water. This will prevent future GPAs for development that would result in a demand for water exceeding available imported water or groundwater supplies.
- USS-4.2 requires the County to implement, and revise as necessary, the County Green Building Program with incentives for development that is energy efficient and conserves resources, including both groundwater and imported water. Participation in this program can potentially reduce future demand on existing water supplies.
- USS-4.3 is the implementation of Policy I-84 requiring that discretionary projects obtain water district commitment that water services are available. This will prevent future discretionary projects in water district areas that require imported water supply in exceedance of existing availability. USS-4.3 also requires the County to implement and revise as necessary Board Policy G-15 to conserve water at County facilities. Water conservation efforts at County facilities will reduce future demand on water supply in the County and serve as an example to other land uses that rely on water supply.
- USS-4.4 is the implementation of the Groundwater Ordinance to balance groundwater resources with new development. USS-4.4 also requires the County to implement and revise as necessary the Watershed Ordinance to encourage the removal of invasive species to restore natural drainage systems, thereby improving water quality and surface water filtration. In addition, this measure requires implementation and revision of the Ordinance Relating to Water Efficient for Landscaping to further water conservation through the use of recycled water. These efforts will minimize drawdown of groundwater supply, allow for recharge of groundwater storage, and reduce future demand of imported water and groundwater.

- USS-4.5 requires the County to use the County Guidelines for Determining Significance for Groundwater Resources, Surface Water Quality, and Hydrology to identify and minimize adverse environmental effects on groundwater resources.
- USS-4.6 requires the County to establish a water credits program between the County and the Borrego Water District to encourage an equitable allocation of water resources. This measure will potentially allow for replacement of water intensive uses in Borrego with land uses that require less groundwater.
- USS-4.7 is the coordination with the San Diego County Water Authority and other water agencies to correlate land use planning with water supply planning and support continued implementation and enhancement of water conservation programs. This effort will reduce the potential for exceedance of water availability under the General Plan Update.

The project also includes policies in the Land Use and Conservation and Open Space Elements that address water supply. The relevant policies are: LU-8.1, LU-8.2, LU-13.1, LU-13.2, COS-4.1 through COS-4.4, COS-5.2, and COS-5.5. These policies require that densities and development in groundwater dependent areas be consistent with the long-term sustainability of groundwater supplies, apply water conservation measures, facilitate regional coordination with water districts, and preserve the quality of local water supply. Adherence to these policies will further reduce impacts associated with adequate water supplies from future development.

**Facts in Support of Finding:** Implementation of the proposed General Plan Update would increase the number of housing units and populations served within the service areas of San Diego County Water Authority member water districts and groundwater dependent water districts. Although multiple planning documents exist to ensure a reliable water supply is available for future growth within the County, issues such as cutbacks in imported water due to regulatory restrictions on pumping from the State Water Project were unaccounted for in these documents. Additionally, the combined effect of the impacts related to obtaining additional water supplies, the uncertainties inherent in obtaining those supplies, and construction impacts related to extraction, processing and/or conveyance of additional water supply leads to the conclusion that implementation of the proposed General Plan Update would be potentially significant.

In addition, the County Groundwater Study projects that some groundwater basins throughout the County would be impacted upon build out of the proposed General Plan Update. This would result in some groundwater dependent water districts having a potentially inadequate water supply. General Plan Update policies and mitigation measures would reduce impacts to water supplies, but not to below a level of significance.

The following measure was also considered to reduce impacts to adequate water supplies to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

- (1) Measure: Implement a Countywide moratorium on building permits and development applications in any areas of the County that would have an inadequate imported water supply to serve future development until adequate supplies are procured.

Rationale for Rejection: This would effectively result in no increase in the amount of imported water demand within the unincorporated County. However, this measure would impede the County's ability to implement the General Plan Update because it would prohibit future development in areas identified for increased growth in the General Plan Update. This mitigation measure would also conflict with the project objective to support a reasonable share of projected regional population growth. Therefore, for the reasons listed above, this mitigation measure would not be implemented.

None of the project alternatives would reduce impacts associated with adequate water supplies to below significant. While the Environmentally Superior Alternative would further reduce the impacts to water supplies, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to adequate water supplies would remain significant and unavoidable.

**Cumulative Impact – Adequate Water Supplies:** As described above, implementation of the proposed General Plan Update would have the potential to exceed existing water entitlements and resources, necessitate new or expanded entitlements, deplete groundwater supplies, or substantially interfere with groundwater recharge. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Many water districts that would serve cumulative project areas have prepared and adopted Urban Water Management Plans (UWMPs) and/or other planning documents that include supply and demand projections and procurement strategies to ensure a reliable water supply exists to meet the projected demand within

the region. However, the most recent UWMPs available are from 2005 and do not account for factors such as unprecedented multiple dry years in the Colorado River Basin or cutbacks in water imports from other areas of the State, such as those caused by the U.S. District Court decision regarding the endangered Delta smelt (fish). Therefore, cumulative projects would have the potential to increase the demand for potable water in the region in a manner that exceeds existing entitlements and resources. Although regulations such as the California Water Code, SB 610, SB 221, Urban Water Management Planning Act, Water Conservation Projects Act, and San Diego Groundwater Ordinance, are intended to reduce impacts to water supply, impacts in the San Diego region would remain significant and unavoidable. General Plan Update policies and mitigation measures would reduce cumulative impacts to water supplies, but not to below a level of significance. An additional mitigation measure as described above for project-level impacts was considered but found to be infeasible. Therefore, project impacts to adequate water supplies would remain cumulatively considerable.

- C-18 Significant Effect – Sufficient Landfill Capacity:** The FEIR identifies significant impacts related to insufficient permitted landfill capacity to accommodate the project's solid waste disposal needs.

**Mitigation Measures:** The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- USS-6.1 requires the County to participate in interjurisdictional reviews to gather information on and provide comments on plans of incorporated jurisdictions and public agencies in the region. It also requires the County to work with other jurisdictions in the region to facilitate regulations to site recycling facilities. This effort will help the County and other jurisdictions to plan for solid waste disposal concurrent with need and to reduce solid waste production through increased recycling.
- USS-6.2 requires the County to review all plans for large scale projects and planned developments to ensure there is space allocation for on-site storage to separate recyclable solid waste. This measure will increase participation in recycling and reduce solid waste output.
- USS-6.3 requires the County to promote and enforce the Management of Solid Waste Ordinance requiring mandatory recycling. This measure further requires the County to evaluate the Zoning Ordinance and other County ordinances, codes and policies to allow the development of the most environmentally sound infrastructure for solid waste facilities including recycling, reuse and composting businesses. This requirement will increase recycling efforts and reduce solid waste output in the County. In addition, USS-6.3 also requires implementation of the Zoning Ordinance mandate for a Major Use Permit for new landfills to ensure the facilities are sited in accordance with the San Diego County IWMP. This regulation will help with the

successful processing of new landfill projects, thereby increasing landfill capacity in the County.

- USS-6.4 is the use of Board Policy B-67 requiring the County to purchase products containing recycled and recyclable materials. Recycling efforts at County facilities will reduce future demand on County landfills and serve as an example to other land uses that generate solid waste.
- USS-6.5 requires the County to regulate refuse hauling companies through County Franchise Hauler Agreement permits and coordinate with solid waste facility operators to extend and/or expand existing landfill capacity by encouraging on-site materials diversion options. USS-6.5 further requires the County to develop incentives to encourage pilot projects with unincorporated area landfills to use anaerobic digesters to process organic materials currently being landfilled. This measure can promote alternative means of solid waste disposal and alleviate some demand on landfills.
- USS-6.6 requires the County to permit and regulate solid waste operators and closed solid waste disposal sites to ensure compliance with California Code of Regulations and Titles 14 and 27. This measure will ensure that landfills meet current State standards.
- USS-6.7 requires the County to maintain and monitor inactive solid waste disposal sites to ensure compliance with all applicable environmental regulations, and establish additional compatible uses for inactive solid waste sites, where possible, that generate cost-saving revenue and provide desirable community resources. This measure ensures that landfills minimize their impacts and increase their value, thereby making solid waste facilities feasible and desirable operations in the County.
- USS-6.8 requires the County to conduct recycling and composting public education programs for residents, schools, and businesses; and to develop programs to assist farmers, residents, and businesses to divert organic materials. USS-6.8 requires the County to encourage County and private contractors and developers to practice deconstruction and recycling of construction, demolition and land clearing debris. Implementation of this measure will reduce demand on solid waste facilities through alternative disposal options for the public.

The project also includes policies in the Land Use and Conservation and Open Space Elements that address landfill capacity. The relevant policies are: LU-12.1, LU-12.2, LU-16.1, LU-16.2, LU-16.3, and COS-17.1 through COS-17.4, COS-17.6, COS-17.7 and COS-17.8. These policies require concurrency of infrastructure and services with development; require the maintenance of such services; encourage recycling facilities; and require landfill waste management, composting, methane recapture, and recycling.



Adherence to these policies will further reduce impacts associated with insufficient landfill capacity from future development.

**Facts in Support of Finding:** If additional landfills are not constructed and existing landfills are not expanded, the Integrated Waste Management Plan Siting Element estimates that the County will run out of physical landfill capacity by 2016. Therefore, the development of future land uses as designated in the General Plan Update would have the potential to be served by landfills with insufficient capacity to accommodate the future solid waste disposal needs. General Plan Update policies and mitigation measures would reduce impacts to landfill capacity, but not to below a level of significance.

The following measures were also considered to reduce impacts to sufficient landfill capacity to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

- (1) Measure: Require all proposed development to obtain written verification of sufficient landfill capacity for the next 20 years.

Rationale for Rejection: This mitigation measure would prove infeasible because existing landfill facilities are not projected to have sufficient capacity to serve future demand. Therefore, this measure would impede the County's ability to implement the General Plan Update because it would prohibit future development in areas identified for increased growth in the General Plan Update. This mitigation measure would conflict with the project objective to support a reasonable share of projected regional population growth because new development would be unable to obtain verification of adequate landfill capacity for the next 20 years and, therefore, future growth in the unincorporated County would be prohibited. .

- (2) Measure: Require any proposed project that is expected to result in an increase in solid waste disposal demand to construct a solid waste disposal facility, concurrent with development, to meet the needs of the project.

Rationale for Rejection: This mitigation measure would prove infeasible because it places the burden of development of new solid waste disposal facilities on the developer, would require permits from local and State agencies, and would have the potential result in environmental consequences from creating multiple solid waste facilities throughout the unincorporated County. This mitigation measure would result in significant environmental impacts from the construction of multiple solid waste facilities throughout various areas of the unincorporated County. Implementing multiple solid waste disposal sites would increase environmental degradation throughout the unincorporated County, which would contradict the project's objective

to promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.

None of the project alternatives would reduce impacts associated with sufficient landfill capacity to below significant. While the Environmentally Superior Alternative would further reduce landfill capacity impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the project objective of recognizing community and stakeholder interests while striving for consensus.

**Conclusion:** Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to sufficient landfill capacity would remain significant and unavoidable.

**Cumulative Impact – Sufficient Landfill Capacity:** As described above, implementation of the proposed General Plan Update would have potential impacts related to insufficient permitted landfill capacity to accommodate the project's solid waste disposal needs. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact.

**Facts in Support of Finding:** Many cumulative projects, such as those proposed under adjacent city and county general plans, private projects not included in the proposed General Plan Update, or projects on tribal land, would increase solid waste disposal and management needs within the region. The existing regional landfill facilities do not have the capacity to accommodate the solid waste disposal needs of the cumulative projects. Either new landfill facilities and/or recycling facilities would be needed to meet the anticipated disposal needs. However, in many areas it is often difficult to find suitable sites to provide additional landfill facilities that would increase capacity. General Plan Update policies and mitigation measures would reduce cumulative impacts to landfill capacity, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, project impacts to sufficient landfill capacity would remain cumulatively considerable.

Despite these unavoidable effects, a comprehensive update to the County's General Plan is still being proposed because the existing General Plan is based on outdated information and is, therefore, not considered to be a sound basis for current land use decisions.

## Section D – Findings Regarding Alternatives

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Section 15126.6(a) of the State CEQA Guidelines requires the discussion of “a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Five alternatives to the Proposed Project were analyzed, including the No Project Alternative, Hybrid Map Alternative, Draft Land Use Map Alternative, Environmentally Superior Map Alternative, and the Recommended Project Alternative. The Recommended Project Alternative will be presented to the decision makers for adoption. Analysis of this project alternative is included in Volume IV of the EIR and is the project being recommended for approval by staff based on a consideration of the alternatives, project objectives, project benefits, environmental impacts, stakeholder input, and numerous other factors. These alternatives are compared to the impacts of the Proposed Project (Referral Map) and are assessed relative to their ability to meet the adopted objectives of the project. In addition, a number of alternatives were considered and rejected, as described in Section 4.1.1 of the EIR, pursuant to CEQA Guidelines Section 15126.6(c).

These findings contrast and compare the alternatives where appropriate in order to demonstrate that the selection of the Recommended Project, while still causing certain unavoidable significant environmental impacts, would result in substantial environmental, planning, public safety, economic, and other benefits. In rejecting the balance of the alternatives that were analyzed in the EIR, the County of San Diego has examined the General Plan Update project objectives and weighed the ability of each of the various alternatives to meet the objectives. The County finds that the Recommended Project best meets the project objectives with the least environmental impact. The objectives that were adopted by the County, and which set the framework for the Project, are as follows:

1. Support a reasonable share of projected regional population growth.
2. Promote sustainability by locating new development near existing infrastructure, services, and jobs.
3. Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities.
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County’s character and ecological importance.
5. Ensure that development accounts for physical constraints and the natural hazards of the land.
6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.

8. Preserve agriculture as an integral component of the region's economy, character, and open space network.
9. Minimize public costs of infrastructure and services and correlate their timing with new development.
10. Recognize community and stakeholder interests while striving for consensus.

The following provides a summary of the Proposed Project and each alternative fully analyzed in Chapter 4.0 and Volume IV of the Final EIR. The summary includes rationale as to why the Recommended Project is preferred over the Proposed Project and each of the other alternatives and why an alternative has been rejected.

### ***No Project Alternative***

The No Project Alternative (refer to Subchapter 4.5 of the EIR) assumes that the existing General Plan would remain in effect. Under this No Project Alternative, the existing General Plan elements and community plans would remain the guiding documents for development in the unincorporated County. Existing General Plan maps, objectives and policies would continue to be in effect, as would existing zoning and other regulations.

Whereas the Recommended Project concentrates population growth in the western areas of the County where infrastructure and services are available, the No Project Alternative has less focus on environmental and infrastructure constraints. The development capacity of the existing General Plan is greater (112,167 additional future dwelling units) than the Recommended Project (65,804 additional future dwelling units). Additionally, the No Project Alternative generally allows higher densities in areas outside of the SDCWA boundary as compared to the Recommended Project. For most subject areas evaluated in the EIR, the No Project Alternative would have substantially greater and more severe environmental impacts than the Recommended Project or other alternatives analyzed (refer to Table 4-3 in Chapter 4 of the EIR). Moreover, the No Project Alternative does not include any of the mitigation measures described in the EIR and the Mitigation Monitoring and Reporting Program.

The No Project Alternative would meet three of the objectives identified for the proposed project. These include the following objectives: 1) support a reasonable share of projected regional population growth; 6) provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns; and 8) preserve agriculture as an integral component of the region's economy, character, and open space network.

The No Project Alternative would not achieve the following seven objectives: 2) promote sustainability by locating new development near existing infrastructure, services, and jobs; 3) reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities; 4) promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance; 5) ensure that development accounts for

physical constraints and the natural hazards of the land; 7) maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change; 9) minimize public costs of infrastructure and services and correlate their timing with new development; and 10) recognize community and stakeholder interests while striving for consensus.

Under the No Project Alternative, high density land uses would be located in the eastern portion of the unincorporated County, which would promote land consumption within those portions of the County, rather than reduce it. Therefore, Objective 2 would not be met by the No Project Alternative. Objective 3 would not be met by the No Project Alternative because, unlike the Recommended Project, this alternative would not increase development densities within existing villages and communities, and would not reinforce the existing character and economy of local communities. Objective 4 would not be achieved by the No Project Alternative because land uses and development would be located in many undeveloped and rural eastern portions of the unincorporated County. These areas contain multiple natural resources and habitats of ecological importance. The No Project Alternative would not achieve objectives 5 or 9 because the majority of future development would be in the eastern portion of the unincorporated County, which provides limited connections to existing infrastructure and has an increased wildland fire risk. Objective 7 would not be achieved by the No Project Alternative because this land use pattern would not focus growth in village centers or near existing public services and development would likely increase vehicle trips within the unincorporated County. Objective 10 would not be met by the No Project Alternative, because it would not incorporate stakeholder considerations that were received during the scoping, public review, and hearing process for the proposed project.

Therefore, the No Project Alternative has been rejected because it fails to meet seven of the ten project objectives and would result in substantially greater environmental impacts when compared to the Recommended Project.

### ***Proposed Project (Referral Map)***

The Referral Map was analyzed as the Proposed Project in the EIR. The Proposed Project would result in greater impacts than the Recommended Project for each significant effect evaluated in the EIR. As such, the Recommended Project would substantially lessen the potential direct and cumulative impacts anticipated by the Proposed Project (refer to Table 4 within Volume IV of the EIR).

The Proposed Project would achieve all ten of the project objectives. When compared to the Recommended Project, the Proposed Project would better fulfill the first project objective: 1) support a reasonable share of projected regional population growth. The Referral Map/Proposed Project is considered to better fulfill this objective because the development capacity of the Proposed Project is greater (71,540 additional future dwelling units) than the Recommended Project (65,804 additional future dwelling units). However, for nine of the ten objectives, the Recommended Project equally or better fulfills the project objectives.

The Proposed Project would promote sustainability by locating new development near existing infrastructure, services, and jobs (Objective 2); however, the Recommended Project would also achieve this objective with less overall development (approximately 5,700 fewer dwelling units). The Proposed Project would reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities (Objective 3); however, the Recommended Project would better fulfill this objective because reduced development would result in fewer potential impacts to community character. While the Proposed Project would protect natural resources and habitats of ecological importance (Objective 4), the Recommended Project would accomplish this with less overall impacts to natural and biological resources. The Proposed Project accounts for physical constraints and natural hazards (Objective 5); yet the Recommended Project better achieves this objective because it further reduces development density in groundwater-dependent areas and very high fire hazard areas. Both the Proposed Project and the Recommended Project would provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns (Objective 6); thus, they are considered to equally fulfill this project objective. The Proposed Project would maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change (Objective 7); however, the Recommended Project would further reduce emissions with 826,063 fewer vehicle miles traveled. While both the Proposed and Recommended Projects would preserve agriculture in the region (Objective 8), the Recommended Project is estimated to result in 2,468 fewer acres of impacts to agricultural resources and would, therefore, better meet this goal. When compared to the Proposed Project, the Recommended Project would further minimize public costs of infrastructure and services (Objective 9) because less infrastructure and services would be required due to the reduced development proposed. While both the Proposed Project and the Recommended Project recognize community and stakeholder interests (Objective 10), the Recommended Project was developed in response to written comments and in response to public testimony during eight Planning Commission hearings; thus, the Recommended Project is the most comprehensive representation of community and stakeholder interests.

Therefore, the Proposed Project has been rejected because it would result in greater environmental impacts without better fulfilling the project objectives when compared to the Recommended Project.

### ***Hybrid Map Alternative***

The Hybrid Map Alternative would result in greater impacts than the Recommended Project for all of the significant effects evaluated in the EIR. As such, the Recommended Project would substantially lessen the potential direct and cumulative impacts anticipated by the Hybrid Map Alternative.

The Hybrid Map Alternative would achieve all ten of the project objectives. When compared to the Recommended Project, the Hybrid Map Alternative would better fulfill the first project objective: 1) support a reasonable share of projected regional population growth. The Hybrid

Map Alternative is considered to better fulfill this objective because the development capacity of the Hybrid Map Alternative is greater (68,224 additional future dwelling units) than the Recommended Project (65,804 additional future dwelling units). However, for nine of the ten objectives, the Recommended Project equally or better fulfills the project objectives.

The Hybrid Map Alternative would locate new development near existing infrastructure, services, and jobs (Objective 2); yet, the Recommended Project would accomplish this goal with less development (approximately 2,400 fewer dwelling units). While the Hybrid Map Alternative would reinforce the vitality, local economy, and character of communities (Objective 3), the Recommended Project would better fulfill this objective because reduced development would result in less community character impacts. The Hybrid Map Alternative would promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance (Objective 4); however, the Recommended Project would accomplish this with approximately 6,497 fewer acres of impacts to biological resources. Although the Hybrid Alternative land use map accounts for physical constraints and natural hazards of the land (Objective 5), the Recommended Project further reduces development density in groundwater-dependent areas and fire hazard severity zones. Since both the Hybrid Map Alternative and the Recommended Project would provide and support a multi-modal transportation network (Objective 6), they are considered to equally fulfill this project objective. The Hybrid Map Alternative would maintain sustainable communities/reduced greenhouse gas emissions (Objective 7); however, the Recommended Project would further reduce potential GHG emissions from vehicles. While both the Hybrid Map Alternative and Recommended Project would preserve agriculture (Objective 8), the Recommended Project is estimated to result in 889 fewer acres of impacts to agricultural resources compared to the Hybrid Map Alternative. The Hybrid Map Alternative would minimize public costs of infrastructure and services and correlate their timing with new development (Objective 9); however, less infrastructure and services would be required under the Recommended Project due to the reduced development proposed. When compared to the Hybrid Map Alternative, the Recommended Project better recognizes community and stakeholder interests (Objective 10) since it was developed in response to written comments and public testimony provided during the Planning Commission hearing process.

Therefore, the Hybrid Map Alternative has been rejected because it would result in greater environmental impacts than the Recommended Project without better fulfilling the project objectives.

### ***Draft Land Use Map Alternative***

The Draft Land Use Map Alternative would result in greater impacts than the Recommended Project for all of the significant effects evaluated in the EIR. As such, the Recommended Project would substantially lessen the potential direct and cumulative impacts anticipated by the Draft Land Use Map Alternative.

The Draft Land Use Map Alternative would achieve all ten of the project objectives. When

compared to the Recommended Project, the Draft Land Use Map Alternative would better fulfill the first project objective: 1) support a reasonable share of projected regional population growth. The Draft Land Use Map Alternative is considered to better fulfill this objective because the development capacity of the Draft Land Use Map Alternative is greater (67,803 additional future dwelling units) than the Recommended Project (65,804 additional future dwelling units). However, for nine of the ten objectives, the Recommended Project equally or better fulfills the project objectives.

The Draft Land Use Map Alternative would meet Objective 2 by promoting sustainability and locating new development near existing infrastructure, services, and jobs; however, the Recommended Project would achieve this objective with less development (approximately 3,780 fewer dwelling units). The Draft Land Use Map Alternative would reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities (Objective 3); yet, the Recommended Project would also accomplish this with reduced development and less impacts to community character. While the Draft Land Use Map Alternative would protect the range of natural resources and habitats of ecological importance (Objective 4), the Recommended Project would better achieve this aim with approximately 1,138 fewer acres of impacts to biological resources. The Draft Land Use Map Alternative accounts for physical constraints and natural hazards (Objective 5); however, the Recommended Project further reduces development density in environmentally constrained areas. Since both the Draft Land Use Map Alternative and the Recommended Project would provide and support a multi-modal transportation network (Objective 6), they are considered to equally fulfill this project objective. The Draft Land Use Map Alternative would maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change (Objective 7); yet, the Recommended Project would further reduce potential GHG emissions with 494,828 fewer vehicle miles traveled. Both the Draft Land Use Map Alternative and Recommended Project would equally preserve agriculture as an integral component of the region's economy, character, and open space network (Objective 8) and, therefore, they are considered to equally fulfill this project objective. The Draft Land Use Map Alternative would minimize public costs of infrastructure and services (Objective 9); however, less infrastructure and services would be required under the Recommended Project due to the reduced development proposed. While both the Draft Land Use Map Alternative and the Recommended Project recognize community and stakeholder interests (Objective 10), the Recommended Project was developed in response to written comments and in response to public testimony during eight Planning Commission hearings; thus, the Recommended Project is the most comprehensive representation of community and stakeholder interests

Therefore, the Draft Land Use Map Alternative has been rejected because it would result in greater environmental impacts without better fulfilling the project objectives when compared to the Recommended Project.



***Environmentally Superior Map Alternative***

The environmental impacts under the Environmentally Superior Map Alternative would be less than the Recommended Project for all of the significant effects evaluated in the EIR. As such, the Environmentally Superior Alternative would substantially lessen the potential direct and cumulative impacts anticipated by the Recommended Project.

The Environmentally Superior Map Alternative would achieve nine of the project objectives with varying levels of fulfillment. This alternative would not achieve Objective 10: Recognize community and stakeholder interests while striving for consensus. The Environmentally Superior Map Alternative does not meet this objective because it was developed in response to the areas of significant impacts that were identified for the Proposed Project where changes in land use designations would have the potential to reduce or alleviate the impact. This alternative reflects a more stringent application of the planning concepts that take into account environmental considerations and constraints, and is more aggressive in restricting growth. In contrast, the Recommended Project was developed through a comprehensive public effort driven by two stakeholder advisory groups, over 500 public meetings, and continual refinements in response to public comments and public hearing testimony.

For Objective 1 (support a reasonable share of projected regional population growth) and Objective 3 (reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities), the Environmentally Superior Map Alternative does not fulfill these objectives as well as the Recommended Project would, because this alternative proposes a smaller population and reduced development (56,839 additional future dwelling units) when compared to the Recommended Project (65,804 additional future dwelling units).

For seven of the project objectives, the Environmentally Superior Map Alternative would be considered to equally or better fulfill the objectives. This alternative would reduce land consumption and promote sustainability (Objective 2) when compared to the Recommended Project because it proposes 8,965 fewer dwelling units. The Environmentally Superior Map Alternative would better protect the range of natural resources and habitats of ecological importance (Objective 4) as it would have 27,098 fewer acres of impacts to biological resources compared to the Recommended Project. Similarly, the Environmentally Superior Map Alternative accounts for physical constraints and natural hazards (Objective 5) as it substantially reduces development density in environmentally constrained areas. Since both the Environmentally Superior Map Alternative and the Recommended Project would provide and support a multi-modal transportation network (Objective 6), they are considered to equally fulfill this project objective. The Environmentally Superior Map Alternative would better maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change (Objective 7) when compared to the Recommended Project as it would have 15,713 fewer vehicle miles traveled. Both the Environmentally Superior Map Alternative and Recommended Project would equally preserve agriculture as an integral component of the region's economy, character, and open space network (Objective 8). Since the Environmentally

Superior Map Alternative would need less infrastructure and services due to the reduced development proposed, it would better achieve Objective 9, which is to minimize public costs of infrastructure and services.

Although this alternative would be consistent with some of the objectives of the Proposed Project, the Environmentally Superior Alternative would not adequately meet Objectives 1, 3, and 10. As such, it has been deemed infeasible for social, economic and other reasons, such as achieving community consensus. Pursuant to CEQA Guidelines Section 15093, therefore, the County adopts the Statement of Overriding Considerations and rejects the Environmentally Superior Map Alternative because specific economic, legal, social, technological or other considerations make the alternative infeasible and because it would not adequately meet the project objectives.

## Attachment A Supplemental CEQA Findings Pertaining to Climate Change

### Purpose

This document provides additional information to support Finding A-37, Climate Change and Compliance with Assembly Bill (AB) 32. AB 32 requires California to reduce greenhouse gas (GHG) emissions to 1990 levels by the year 2020. As part of compliance, preparation of a Climate Action Plan (CAP) is described in Mitigation Measure CC-1.2 of the San Diego County General Plan Update Final Environmental Impact Report (EIR).

### Background

#### ***GHG Emissions Inventories***

A first step in preparing a CAP is to calculate existing GHG emissions. In 2009, the University of San Diego's Energy Policy Initiatives Center (EPIC) calculated GHG emissions for the County of San Diego (County) for both community-wide sectors and government operations for the years 1990 and 2006, with emissions projections for 2020. The results are included in the EIR Appendix K and summarized below and in Table 1.

County-wide community emissions were calculated to be 5,139,821 metric tons (MT) of carbon dioxide equivalent (CO<sub>2</sub>e) in 1990, and 5,619,538 MT CO<sub>2</sub>e in 2006. The business-as-usual (BAU) projected 2020 emissions for the community totals 6,975,287 MT CO<sub>2</sub>e.

Although government operations are included in the community-wide inventory, municipalities often also conduct a separate GHG inventory for government operations. This is because the local government may have more control over reduction measures for sectors within its operational control, and because it serves as an example to the community for emissions reductions. The County's operational GHG emissions totaled 137,204 MT CO<sub>2</sub>e in 1990 and 160,776 MT CO<sub>2</sub>e in 2006. In addition, emissions under the BAU scenario in 2020 were estimated to be 175,609 MT CO<sub>2</sub>e.

**Table 1. San Diego County Community and Government Emissions**

	<b>1990 (MT CO<sub>2</sub>e)</b>	<b>2006 (MT CO<sub>2</sub>e)</b>	<b>2020 BAU (MT CO<sub>2</sub>e)</b>
<b>Community</b>	5,139,821	5,619,538	6,975,287
<b>Government Operations</b>	137,204	160,776	175,609

#### ***Target Setting***

Achieving 1990 GHG emission levels by 2020 is the goal of AB 32; however, data from 1990 are frequently unavailable or are limited in detail, and often targets are set according to a "baseline" year. A baseline year is one that is more current, which allows for more detailed calculations and better accounting in the future of where emissions reductions have been achieved (for example, 2006 in the County inventory). This is an accepted practice in CAPs and by the California Air Resources Board (ARB). In the EPIC inventory, 1990 GHG emissions were

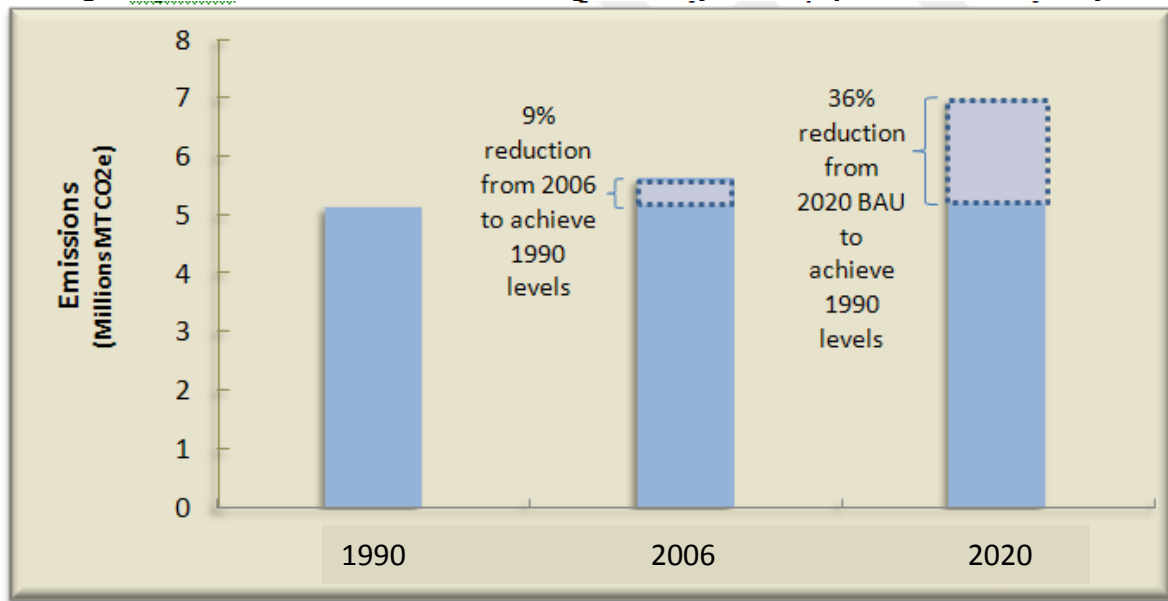
estimated and used for target setting. However, to maintain consistency of language used in other municipalities' adopted CAPs, the reduction targets are set according to 1990 levels but stated in terms of the baseline year, as explained below.

To achieve AB 32's 2020 target, community-wide emissions would have to be reduced by 479,717 MT CO<sub>2</sub>e from 2006 levels. **A 9% reduction from 2006 levels is necessary to achieve 1990 levels:**

$$\frac{(2006 \text{ emissions} - 1990 \text{ emissions})}{2006 \text{ emissions}} = \frac{5,619,538 - 5,139,821}{5,619,538} = 9\%$$

In terms of 2020 BAU emissions, achieving the 1990 target would require a 36% reduction from BAU 2020 levels (Figure 1).

**Figure 1. GHG Emissions for San Diego County Unincorporated Community**



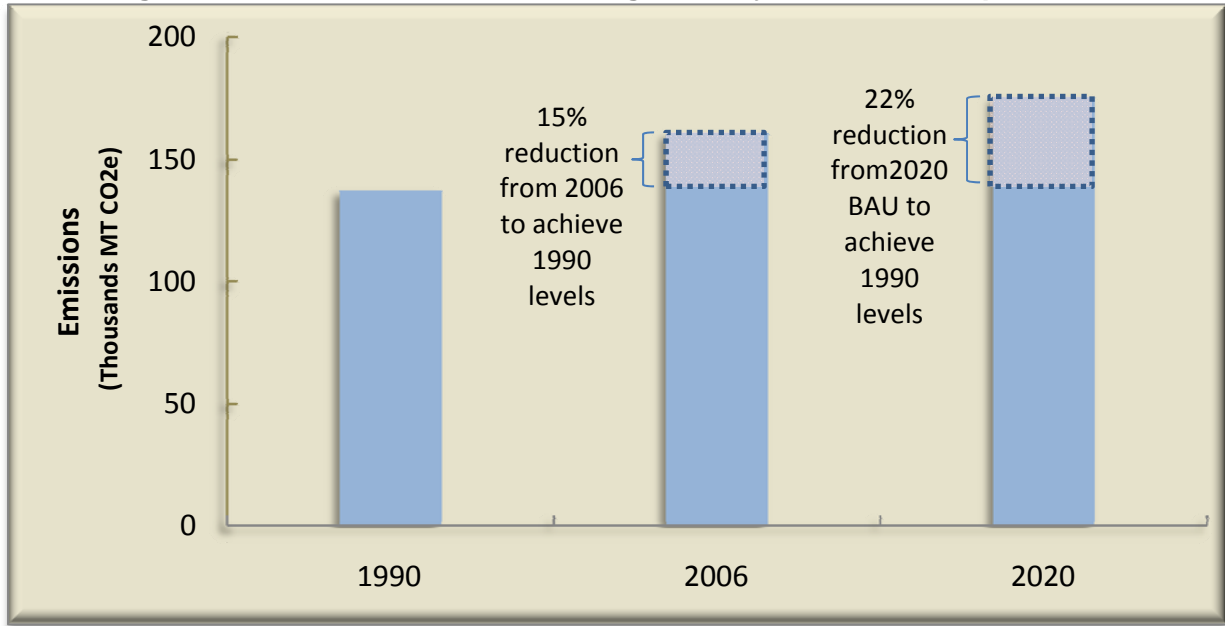
Similarly, to achieve 1990 GHG emissions levels, County government operational emissions would have to be reduced 23,575 MT CO<sub>2</sub>e from 2006 levels, which represents a **15% reduction from 2006 levels**<sup>1</sup>:

$$\frac{(2006 \text{ emissions} - 1990 \text{ emissions})}{2006 \text{ emissions}} = \frac{160,776 - 137,204}{160,776} = 15\%$$

In terms of 2020 BAU emissions, achieving the 1990 target would require a 22% reduction from BAU 2020 levels (Figure 2).

<sup>1</sup> In the EIR Appendix K, a 17% reduction from 2006 levels was referenced for County government operations. However, this was a miscalculation that would result in an emissions target lower than 1990 levels by 2020. To be consistent with the EIR goal of 17% reductions from 2006 levels, the mitigation measures outlined in this Erratum would achieve at least 17% reduction from 2006 levels; however, to reach 1990 levels, a 15% reduction from 2006 levels is required.

**Figure 2. GHG Emissions for San Diego County Government Operations**



### **Updated Inventories**

Since the completion of the EPIC inventory, methodologies for conducting an emissions inventory have been refined to provide consistency among communities and municipalities. Currently, ARB has adopted a local government operations methodology called the Local Government Operations Protocol (LGOP). There are some methodologies that apply equally to community and government inventories. In addition, there are best-practices for community inventory methodology, like those from the Intergovernmental Panel on Climate Change (IPCC). While these provide a much more accurate inventory, they also require substantial input data, which are often not available to conduct a 1990 inventory, as noted earlier. To adhere to the adopted LGOP and to provide a more accurate estimate of the community-wide GHG emissions used in the CAP, the County, with the help of ICLEI-Local Governments for Sustainability and AECOM, to update the existing inventories. Consequently, 1990 inventories were not possible; however, the municipal inventory was updated, keeping the 2006 baseline year, and the community inventory was generated for 2005. The original community inventory baseline year of 2006 was changed to 2005 due to data availability. The revised inventories are shown in Table 2.

**Table 2. Revised San Diego County Community and Government Emissions**

	Baseline (2005/2006) (MT CO <sub>2</sub> e)	2020 BAU (MT CO <sub>2</sub> e)
<b>Community</b>	4,512,580	5,192,689
<b>Government Operations</b>	220,633	218,600

Although the emissions values have changed, the County has assumed that the percent increase from 1990 to 2006 for both the government operations and community-wide emissions was accurate. Therefore, the targets of 9% below baseline community GHG emissions and 15% below baseline government-operations GHG emissions are preserved.

## **Draft Climate Action Plan**

After a GHG emissions inventory has been completed and target reductions have been set, the next step in creating a CAP is to determine feasible methods for achieving the emissions target. The County is currently drafting a CAP; the development of which includes researching GHG reduction measures, calculating the potential reductions associated with the measures, and assessing the economic feasibility and impact of the measures. Some of the information provided below has been taken from the draft CAP, including strategies for achieving GHG emission reduction goals. However, the CAP has not yet been publicly circulated, finalized, or adopted. The County is anticipating completion in 2012. The revised CAP will include refinements to the GHG emissions inventory, mitigation measures, and potentially achievable reductions.

While the information provided here is based on the best information available at the time of preparation, the rapidly evolving nature of climate planning and refinements of the potential for GHG reductions from any given measure may lead to adjustments in the preparation of the CAP. In addition, for purposes of providing supporting evidence for Finding A-37, a conservative approach has been taken, and measures that are included in this document may be refined or added to in the CAP. The data and information provided here are preliminary. The CAP is likely to include GHG reduction measures that extend beyond the year 2020, but, for the purposes of demonstrating compliance with AB 32, measures that would affect GHG emissions by the year 2020 are discussed in the following section. Finally, the CAP will include reduction measures for municipal operations; however, there are no current regulations for GHG reductions from local government operations. Therefore, although the County has numerous programs and policies to reduce GHG emissions, the emissions reductions related to municipal operations are excluded from this discussion.

## **Greenhouse Gas Reduction Strategies**

Table 3 shows baseline GHG emissions, GHG emissions projected under a BAU scenario, and GHG emissions that are projected with the mitigation measures described below. The table illustrates greater reductions than those necessary to achieve the County's goals for reducing community-wide emissions to 9% below baseline by the year 2020. The BAU scenario represents GHG emission projections in the absence of a CAP and statewide measures. As detailed above, the percent reductions were based on 1990 and 2006 inventories completed for the County by EPIC and are included in Appendix K of the EIR.

**Table 3 GHG Emissions, Forecasts and Reductions for  
County Community and Government-Operations**

	<b>Community-Wide Emissions (MT CO<sub>2</sub>e)</b>
Baseline (2005) GHG Emissions	4,512,580
BAU 2020 GHG Emissions	5,192,689
GHG Reductions	1,137,091
<b>Net 2020 GHG Reductions</b>	<b>4,055,598</b>
Percent Change from Baseline	-10.1%
Reduction Goal	-9%

### **Strategies**

The following strategies establish GHG emissions reductions consistent with the General Plan Update, which calls for 9% community-wide emissions reductions from baseline levels by 2020. The target for compliance with AB 32 is to achieve net emissions of 4,106,447 MT CO<sub>2</sub>e (9% reduction) by 2020. A summary of the existing, projected BAU, and GHG reductions are summarized in Table 4. Expected GHG reductions and participation rates are based on expert experience and cited sources. Transportation measures and descriptions are provided by Fehr & Peers.

**Table 4 Summary of Community-wide GHG Emission Reduction Measures**

	<b>2005 Emissions</b>	<b>2020 BAU Emissions</b>	<b>Local Measures</b>	<b>State Measures</b>	<b>Net 2020 Emissions</b>	<b>Change from 2005</b>
	MT CO <sub>2</sub> e					%
<b>Transportation</b>	2,636,702	3,098,307	-92,949	-642,768	2,362,590	-10.4%
<b>Energy</b>	1,121,651	1,303,949	-110,697	-261,824	931,428	-17.0%
<b>Agriculture</b>	190,025	159,246	-6,458	--	152,788	-19.6%
<b>Solid Waste</b>	144,865	162,064	--	--	162,064	11.9%
<b>Wastewater</b>	50,412	56,397	-2,195	--	54,202	7.5%
<b>Potable Water</b>	236,435	264,506	-20,200	--	244,306	3.3%
<b>Other</b>	132,490	148,220	--	--	148,220	11.9%
<b>Total</b>	<b>4,512,580</b>	<b>5,192,689</b>	<b>-232,499</b>	<b>-904,592</b>	<b>4,055,598</b>	<b>-10.1%</b>

## COMMUNITY ENERGY (CE) MEASURES

### CE-1: Retrofit Projects

Reduce emissions from energy consumption through retrofits of existing residential and commercial buildings.

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Existing Residential Buildings – Energy Efficiency Retrofit	26,530
Existing Commercial Buildings – Lighting Retrofit	2,629

#### ***Residential Retrofits***

Under this measure, residents would be encouraged to retrofit their homes. The County would expand efforts and set goals for community participation, facilitating this through education and financing efforts. The County would promote utility and other federal and state incentive efficiency programs such as Energy Upgrade California through, for example, (1) creating “one-stop” centers for information on energy conservation; (2) organizing workshops with information from utilities and agencies; and (3) working to target marketing and free energy audits to owners of older homes, owners with tenants, new homeowners, and owners undertaking renovations. Implementation of these programs would be voluntary; however, this would leverage the County’s existing EECBG funding to gain participation.

This measure assumes that 15% of existing residential units perform low-cost energy efficiency retrofits. The participation rate is similar to participation rates used in other jurisdictions. For example, the County of Alameda’s CAP includes a 20% participation rate for residential retrofits.

#### ***Non-Residential Lighting Retrofit***

Commercial and industrial buildings would implement a lighting retrofit system that employs dual switching (ability to switch roughly half the lights off and still have fairly uniform light distribution), delamping, daylighting, relamping, or other controls or processes that reduce annual energy and power consumption. The goals of this measure would be to reduce lighting electricity demand through retrofits by 40%. This measure assumes a participation rate of 15% of existing commercial buildings. As a reference point, the City of West Hollywood includes a 20% participation rate, assuming 20% efficiency for commercial and industrial building retrofits, not only lighting.

### CE-2: Energy-Efficient New Construction

The County adds approximately 3,000 new units to the building stock each year. New construction offers an opportunity for achieving high levels of energy efficiency through advanced materials and design. California currently requires all buildings to meet 2008 Title 24 energy efficiency standards. The California Energy Commission strengthens these standards every 3 to 5 years to increase efficiency in new buildings. The County may establish more efficiency requirements above Title 24, if needed to achieve an environmental, safety, or public health goal. The 2008 Title 24 energy code ensures greater efficiency in new buildings.



Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
New Residential Development Exceeding State Energy Standards (natural gas)	3,596
New Residential Development Exceeding State Energy Standards (electricity)	304
New Commercial Development to Exceed State Energy Standards (natural gas)	2,087
New Commercial Development to Exceed State Energy Standards (electricity)	3,822

### ***Exceed Title 24***

This measure would involve promoting a green building code that exceeds Title 24 (2008) by 15% for new commercial and residential buildings. A 15% reduction is the minimum requirement for any third party verification requirements such as GreenPoint, Energy Star Rated Homes, and achieving the California Green Building Code Tier I performance criteria. This measure assumes a 50% participation rate.

### **CE-3: Appliance Rebate Program**

Appliances make up a considerable portion of a residential building's energy demand. U.S. Environmental Protection Agency (EPA) Energy Star-rated appliances can provide considerable energy efficiency improvements compared to standard models. Encouraging building owners and tenants to exchange old appliances for energy efficient models would help reduce energy use and GHG emissions in the community. In new residential buildings, builders often supply refrigerators, dishwashers, clothes washers, and ceiling fans. Increasing the number of Energy Star-rated appliances installed in new residences would reduce energy use, GHG emissions, and homeowners' long-term energy bills.

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Promote Existing Appliance Rebate Program (Existing)	14,680
Promote Existing Appliance Rebate Program (New Residential)	5,380

San Diego Gas & Electric (SDG&E) and the state already provide rebates for energy-efficient appliances. Under this program, the County would increase promotion of these programs through additional outreach to residents. Participation rates for existing residential upgrades are assumed to be 20%, while new construction is assumed to be 95% participation for dishwashers, clothes washers, light bulbs, and refrigerators, as most new appliances are EnergyStar rated.

#### CE-4: Smart Grid Optimization

The “smart grid” is an emerging energy management system that can significantly improve how electricity is delivered, consumed, and generated. The “smart grid” can reduce energy demand, improve integration of distributed energy production, and increase the efficiency of electricity transmission and distribution. The “smart grid” will help utilities and their customers make better-informed energy decisions. By the end of 2011, all SDG&E meters will have the new smart technology. Updating customers to smart meters is the crucial first step in enabling the smart grid, but promotion beyond the meters is critical to achieve meaningful energy reductions.

Examples of technology that is compatible with the smart grid are the following:

- Demand response programs that shave peak loads, reducing the need for expensive (and polluting) peaking power plants
- Sensors and meters that show exactly where power is being used, so utilities can expand only where needed and when needed
- Intelligent in-home interfaces to help residents (and businesses) monitor and manage their energy use
- Electronics and control software that monitor power flows in real time, to run existing lines much closer to capacity without compromising reliability
- Sensors and software to remotely monitor expensive equipment to know when it needs to be replaced

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Smart Grid in Existing Commercial and Residential Development	1,993
Smart Grid in All New Commercial and Residential Development	2,755

Under this measure, the County would support the efforts of SDG&E to provide outreach and/or incentives for property owners and tenants to adopt smart grid energy management systems and appliances in their buildings. This measure assumes 10% participation among new and existing development.

#### CE-5: Solar Water Heaters

A solar water heater uses the sun's energy rather than electricity or gas to heat water for homes, pools, and spas. In California, solar water heaters can reduce natural gas consumption by 40% to 70%, in addition to not producing air pollution or GHG emissions. Commercial-scale solar water heating systems are designed to provide large quantities of hot water to non-residential and multi-family buildings.

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Commercial Solar Hot Water Heaters	14,442
Residential Solar Hot Water Heaters	16,122

Under this measure, the County would promote the California Solar Initiative's solar water heating incentive program (CSI – Thermal) to subsidize the purchase of solar water heaters and replace/recycle old water heaters in homes and commercial buildings. This measure assumes 14% of residential units (15% of non-mobile homes and 0% of mobile homes) will reduce, by 70%, their energy used for water heating, and 16% of commercial uses will reduce, by 59%, their energy used for water heating (Participation Range = School and College uses 60% anticipated; Retail, Office, other commercial uses 5% anticipated).

#### CE-6: Alternative Energy Systems

Alternative energy systems may include solar, wind, or geothermal power. Solar photovoltaic (PV) systems generate electrical power by converting solar radiation into direct current electricity using semiconductors. PV power generation employs solar panels composed of cells containing photovoltaic material. PV systems can be retrofitted into existing buildings, usually by mounting them onto an existing roof structure or walls. The California Solar Initiative (CSI) has already incentivized 7.4 MW solar power in residential San Diego County homes and 8.4 MW in commercial facilities since the program began in 2006. This measure assumes a doubling of this amount over the next 8 years. This would equate to about 2,200 residential units and 1.7 million square feet of solar on commercial properties.

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Residential PV	7,661
Commercial PV	8,696

## COMMUNITY TRANSPORTATION (CT) MEASURES

To meet 2020 emissions targets, the community will have to reduce vehicle miles traveled (VMT). Currently, the County-wide workforce commutes primarily by single-occupant vehicle, and commuting accounts for a significant portion of total commute. Creating alternatives to single-occupant trips is the aim of this goal.

### CT-1: Promote Road Sharing

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Promote Road Sharing	15,492

There are limited on-street bicycle lanes in the County. This strategy would promote awareness of bicycles as an alternative means of transportation and encourage road-sharing between bicycles and motorized vehicles.

Research has shown that adding bicycle facilities can increase the percentage of commuters who travel by bicycle. This increase is generally small (1% or less) and typically occurs with the construction or designation of new bicycle lanes. The benefits of this strategy are assumed to be 1%, as this represents the typical experience observed.

This strategy may overlap with other strategies. As such, the effectiveness would be discounted by 50% from 1% to 0.5%.

### CT-2: Trip Reduction

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Implement Voluntary Commute Trip Reduction Program	46,475

Under this program, private employers would be encouraged but not required to implement a travel demand management (TDM) program for their employees. The County's actions would include promotional campaigns, potentially designating a TDM Coordinator, and showcasing the current municipal program as an example.

Empirical studies have shown that these voluntary TDM programs can have a maximum effectiveness of 3%. One major limitation is that these TMD reductions only apply to trips at the employment end and, therefore, the reduction needs to be discounted in Countywide VMT based on the percentage contribution that employee trips make to overall Countywide travel. Estimates of employee travel indicate that only half of the County's VMT is attributable to employee travel. Therefore, the potential effectiveness of this strategy is discounted by 50% to 1.5% as a maximum potential effectiveness.

### CT-3: Promote Use of Transit Network

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Promote Use of Transit Network	30,983

Under this strategy, the County would create an outreach program that encourages use of the bus and other existing transit options.

There is limited empirical evidence documenting the effectiveness of these strategies. A majority of the data relates to expansions of physical facilities or additional service. The estimated benefit of this strategy is, therefore, derived from estimates of transit service improvement, which range from 1% to 8%. As this strategy would involve a promotional campaign, a limited range of effectiveness is assumed (1%).

### COMMUNITY WATER AND WASTEWATER (CR) MEASURES

In Southern California, considerable energy is required to pump, transport, and treat potable water and wastewater, as well as heat and cool it. With constrained water supplies and increasing uncertainty over long-term reliability, water conservation strategies have the double benefit of reducing GHG emissions and aligning demand with future water availability. Opportunities are present to improve the water efficiency of appliances, fixtures, and fixture fittings in the community's existing buildings. The California Green Building Code has outlined specific mandatory requirement for water conservation in new construction.

### CR-1: WWTP Biogas to Energy

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
WWTP Biogas to Energy	2,195

Wastewater treatment plants (WWTP) generate methane gas as a byproduct of the treatment process. Anaerobic digesters can be used to capture methane-rich biogas. This biogas can be combusted in a turbine to produce electricity and heat energy. This reduces the treatment plant's energy demand and, in some cases, electricity can be exported to the grid. Some treatment plants with existing anaerobic digesters and energy generation systems add food waste to the digester to increase the production of biogas. This allows higher levels of energy generation while effectively destroying the methane component of the biogas.

### CR-1: Per-Capita water reductions

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Per Capita Water Reduction (SB 7X)	20,200

California Senate Bill X7-7 (2009) requires all water suppliers to reduce urban per capita water consumption by 2020, either through the “standard target,” a 20% reduction from the average water demand from 1994 to 2004, or the “alternative minimum,” a 5% reduction from the average water demand from 2003 to 2007.

## COMMUNITY AGRICULTURE (CA) MEASURES

### CA-1: Nitrogen Optimization

Using organic or mineral nitrogen fertilizers is essential to maintain soil fertility and provide profitable yields. While these fertilizers are necessary, excessive application generates large amounts of nitrous oxide, a potent GHG. The measure would promote outreach programs that provide information to farmers to allow them to optimize nitrogen application rates, decrease fertilizer input costs, maintain crop yields, and decrease nitrous oxide emissions.

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Nitrogen Optimization Program	199

### CA-2: Field Equipment Fuel Efficiency

Routine maintenance and more efficient equipment operation can provide valuable fuel savings. Engine and equipment upgrades are also expected to increase fuel efficiency. The County will provide outreach to improve on-farm fuel efficiency. The program will also encourage farmers to upgrade tractors and engines and participate in the Air Resource Board's Carl Moyer program that provides incentive grants for cleaner-than-required engines.

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Field Equipment Fuel Efficiency Program	4,433

## CA-2: Irrigation Pump Efficiency

As the cost of photovoltaic panels continues to decline, more farmers are switching to solar-powered irrigation pumps.

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Agriculture Irrigation Pump Efficiency	1,826

## State Measures

Based on the quantified reduction measures listed above, local GHG reductions would achieve 236,070 MT CO<sub>2</sub>e in 2020. This alone would not account for a 9% reduction from baseline (2005) emissions, which is required under AB 32. Therefore, the community will assume credit for the GHG emission reductions that will occur through legislation being implemented at a statewide level.

### Pavley

AB 1493 (“Pavley”) will result in GHG emission reductions from on-road passenger motor vehicles sold in California. The emission-reduction potential associated with implementation of AB 1493 vehicle emission standards would vary depending on the first regulated model year and vehicle turnover between the present fleet and the fleet in 2020. However, ARB provides a tool to estimate GHG reductions that are likely to occur by 2020 (Pavley I + LCFS Postprocessor Ver1.0).

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Pavley I – Passenger Auto and Light Truck Fuel Efficiency	436,334

### Low Carbon Fuel Standard

To reduce the carbon intensity of transportation fuels, ARB developed a Low Carbon Fuel Standard (LCFS), which reduces the carbon intensity of California’s transportation fuels by 10% by 2020, as called for by Executive Order S-01-07. The LCFS is a performance standard with flexible compliance mechanisms that incentivize the development of a diverse set of clean, low-carbon transportation fuel options to reduce GHG emissions. The Pavley I + LCFS Postprocessor Ver1.0 also estimates reductions from this regulation.

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Low Carbon Fuel Standard (Gasoline and Diesel)	206,434

Renewable Portfolio Standard

Senate Bill (SB) 1078 and SB 107 have established increasingly stringent renewable energy requirements for California utilities. SB 1078 required investor-owned utilities to provide at least 20% of their electricity from renewable resources by 2020. SB 107 accelerated the timeframe to take effect in 2010. Renewable energy includes wind, solar, geothermal, or any Renewable Portfolio Standard (RPS)-eligible sources. Executive Order (EO)-S-14-08 increased the RPS further to 33% by 2020. The GHG reductions that would result from the RPS would apply to electricity-related emissions. Although this would include emissions related to water transportation, the level of renewables in place in 2005 varied among utilities in California through which the water is transported to the County. For purposes of being conservative, water-transportation-related energy was not included in the reduction calculations, and, therefore, this measure was applied only to residential, industrial, and commercial electricity consumption within the County, which is served by SDG&E.

Measure	GHG Reduction Potential (MT CO <sub>2</sub> e/year)
Renewable Portfolio Standard (33% Renewable by 2020)	261,824